

July 14, 2015

67
1 - Permit/CD
2 - AO & AO mat
3 - DMR's
4 - Vio. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Date Filed
Clerk's Inits.

Chair

Maggie Hart Stebbins
County of Bernalillo
Commissioner, District 3

Vice Chair

Trudy E. Jones
City of Albuquerque
Councilor, District 8

Richard J. Berry
City of Albuquerque
Mayor

Art De La Cruz
County of Bernalillo
Commissioner, District 2

Rey Garduño
City of Albuquerque
Councilor, District 6

Debbie O'Malley
County of Bernalillo
Commissioner, District 1

Ken Sanchez
City of Albuquerque
Councilor, District 1

Ex-Officio Member
Pablo R. Rael
Village of Los Ranchos
Board Trustee

Executive Director
Mark S. Sanchez

Website
www.abcwua.org

Mr. John Blevins
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

VIA USPS MAIL: CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Subject: Response to Administrative Complaint
Docket Number: CWA-06-2015-1777
NPDES Permit Number: NM0022250

Received

JUL 17 2015

6EN-W

Dear Director Blevins:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) received the referenced Administrative Complaint (Complaint) on June 15, 2015. In accordance with paragraphs 24 and 29 of the Complaint, the Water Authority has filed a timely Answer to the Complaint and included a request for hearing therein. The Answer to the Complaint is included in Attachment 1.

However, prior to any hearing, the Water Authority would like to schedule an informal settlement conference with Robert Houston and other representatives from your office concerning the allegations and the proposed penalty. The primary topics we wish to discuss are as follows: the extensive corrective and remedial action Water Authority has taken in response to each previous violation; corrections needed to address apparent errors in both the number and severity of past violations recited in the Complaint; and the penalty proposed, which we believe is overly harsh and unnecessarily punitive given the Water Authority's proactive approach to compliance with its NPDES permit responsibilities. At the informal settlement conference, we will propose a set of corrective actions in accordance with our previous commitments towards improving the Southside Wastewater Reclamation Plant ("SWRP") in compliance with Administrative Order CWA-06-2015-1733.

WATER AUTHORITY CORRECTIVE ACTIONS SINCE 2011

On July 12, 2011, Water Authority staff, including myself, met with Robert Houston and many other enforcement and legal staff from Region 6 to discuss effluent violation issues at the SWRP. At that time, the Water Authority committed to rebuilding and rehabilitating the wastewater treatment plant. In addition, we committed to update our process control using the BioWin software, improve our training programs and increase the management efforts towards consistent completion of periodic maintenance. We committed to spend \$250 million over ten years for extensive improvements knowing that rebuilding the plant while continuing to operate and maintain permit compliance is difficult. To date, we have spent more than \$60 million including, but not limited to, final clarifier and aeration basin improvements, blower improvements, and the new Preliminary Treatment Facility (PTF).

July 14, 2015

Chair

Maggie Hart Stebbins
County of Bernalillo
Commissioner, District 3

Vice Chair

Trudy E. Jones
City of Albuquerque
Councilor, District 8

Richard J. Berry
City of Albuquerque
Mayor

Art De La Cruz
County of Bernalillo
Commissioner, District 2

Rey Garduño
City of Albuquerque
Councilor, District 6

Debbie O'Malley
County of Bernalillo
Commissioner, District 1

Ken Sanchez
City of Albuquerque
Councilor, District 1

Ex-Officio Member
Pablo R. Rael
Village of Los Ranchos
Board Trustee

Executive Director
Mark S. Sanchez

Website
www.abcwua.org

Mr. John Blevins
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

VIA USPS MAIL: CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Subject: Response to Administrative Complaint
Docket Number: CWA-06-2015-1777
NPDES Permit Number: NM0022250

Dear Director Blevins:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) received the referenced Administrative Complaint (Complaint) on June 15, 2015. In accordance with paragraphs 24 and 29 of the Complaint, the Water Authority has filed a timely Answer to the Complaint and included a request for hearing therein. The Answer to the Complaint is included in Attachment 1.

However, prior to any hearing, the Water Authority would like to schedule an informal settlement conference with Robert Houston and other representatives from your office concerning the allegations and the proposed penalty. The primary topics we wish to discuss are as follows: the extensive corrective and remedial action Water Authority has taken in response to each previous violation; corrections needed to address apparent errors in both the number and severity of past violations recited in the Complaint; and the penalty proposed, which we believe is overly harsh and unnecessarily punitive given the Water Authority's proactive approach to compliance with its NPDES permit responsibilities. At the informal settlement conference, we will propose a set of corrective actions in accordance with our previous commitments towards improving the Southside Wastewater Reclamation Plant ("SWRP") in compliance with Administrative Order CWA-06-2015-1733.

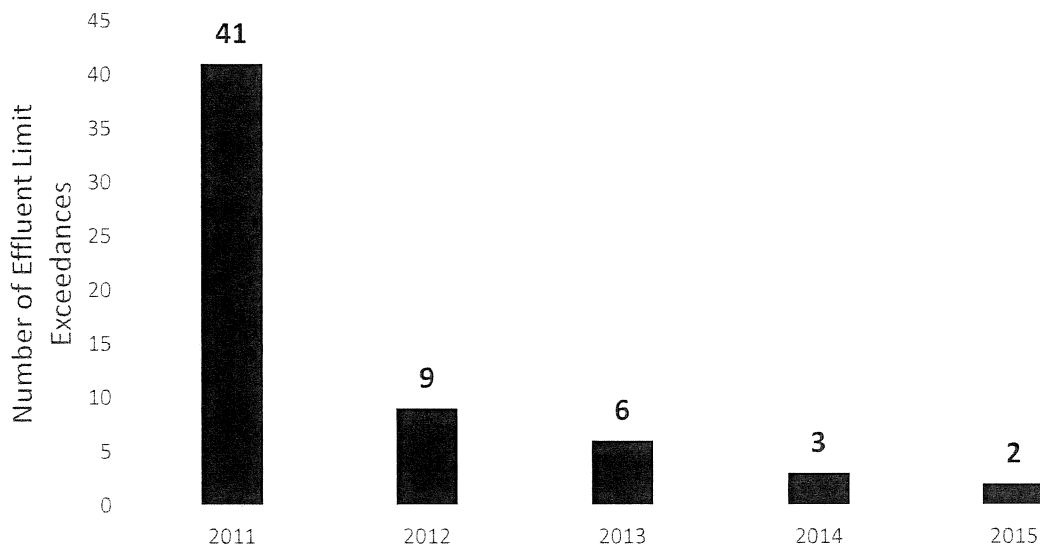
WATER AUTHORITY CORRECTIVE ACTIONS SINCE 2011

On July 12, 2011, Water Authority staff, including myself, met with Robert Houston and many other enforcement and legal staff from Region 6 to discuss effluent violation issues at the SWRP. At that time, the Water Authority committed to rebuilding and rehabilitating the wastewater treatment plant. In addition, we committed to update our process control using the BioWin software, improve our training programs and increase the management efforts towards consistent completion of periodic maintenance. We committed to spend \$250 million over ten years for extensive improvements knowing that rebuilding the plant while continuing to operate and maintain permit compliance is difficult. To date, we have spent more than \$60 million including, but not limited to, final clarifier and aeration basin improvements, blower improvements, and the new Preliminary Treatment Facility (PTF).

As a follow-up to our meeting on July 2011, the Water Authority again met with Mr. Houston in Dallas in October 29, 2014 to discuss the progress made in regards to previous Administrative Orders and illustrate current and future improvement projects. Since 2011, effluent performance of the SWRP has greatly improved. Attachment 2 shows the number of effluent violations at the SWRP by analyte and year. The last full year, 2014, represents a 92% decrease in effluent violations compared to 2011. While we are pleased with the progress, we understand and are committed to increasing our efforts towards eliminating effluent violations all together.

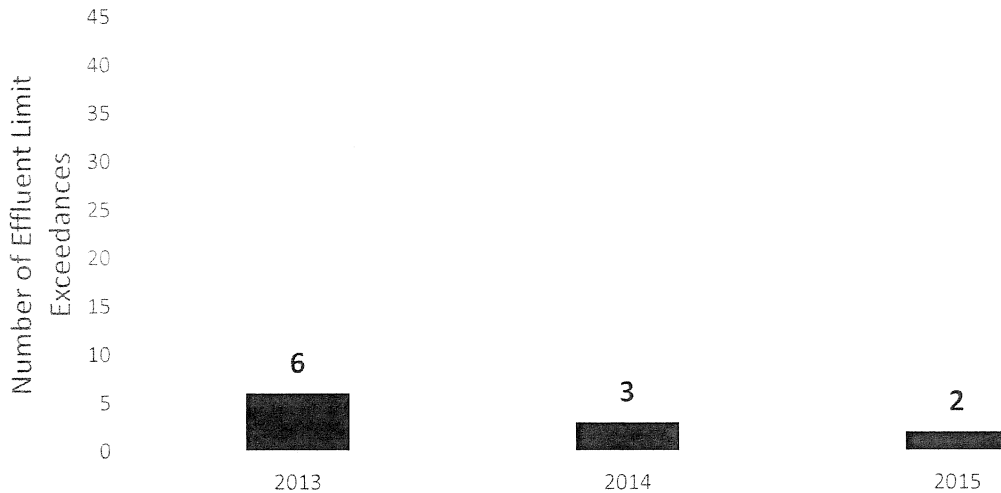
Despite the issuance of a more stringent effluent limits in the NPDES permit issued in October of 2012, effluent violations have continued to trend downward. There have been only 11 effluent violations since the issuance of the new NPDES permit, which is less than a quarter of the total violations in 2011. The Water Authority has not had any permit exceedances in 2015 for Chlorine, Total Inorganic Nitrogen, Mercury, Ammonia, or Total Suspended Solids. Figure 1 depicts the decrease in effluent violations since 2011.

**Figure 1 - NPDES Compliance (All Parameters)
CY 2011 through 2015**



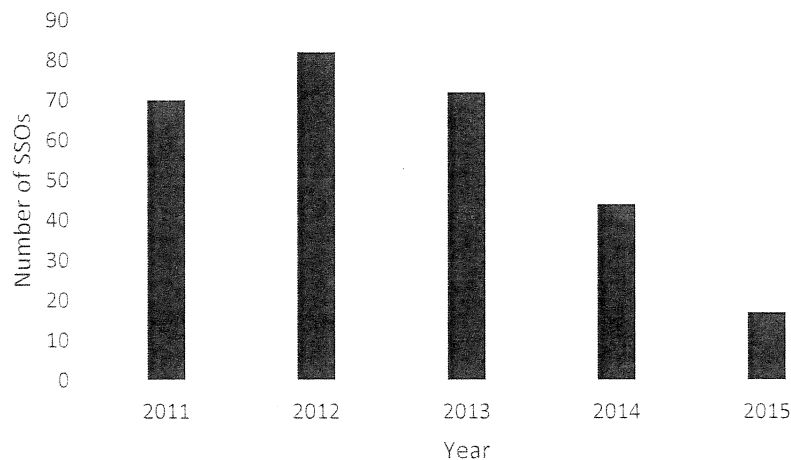
On the following page is Figure 2, which shows the number of violations since the reissuance of the NPDES permit in 2012. This graphic shows clearly that we have made significant progress reducing effluent violations, although we realize that we have more room for improvement.

**Figure 2 - NPDES Compliance (All Parameters)
October 1, 2012 through 2015**



With more than 2,500 miles of collections and interceptors, Sanitary Sewer Overflows (SSO's) continue to occur in the collection system. However, Figure 3 below identifies that the overall number of SSO events in the collection system is also decreasing over time. The Water Authority is actively working to reduce SSO's with new programs (root foaming and FOG buster additive) and establishing a dedicated SSO committee to study the cause of each SSO. We have instituted a Capacity Maintenance, Operation and Management (CMOM) program which we believe will further reduce the amount of SSO's.

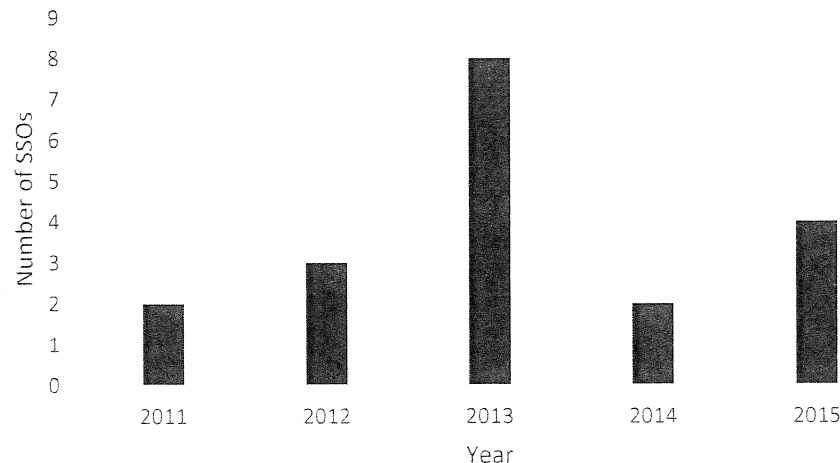
**Figure 3 - Collection System SSO's
CY 2011 to 2015**



Collection system SSOs are captured prior to reaching the Rio Grande and we have developed and implemented plans working with the City, AMAFCA, and Bernalillo County to address these operations. When an SSO occurs, the downstream storm drainage is blocked and then these SSOs are, pumped, treated with chlorine, and washed down. To date, none of these SSOs result in wastewater reaching the Rio Grande.

The Water Authority is also trying to prevent overflows at the SWRP. Figure 4 identifies the number of SSO's at the SWRP between 2011 and February 2015. Most of the SSO's are captured on-site and are treated. In order to eliminate SSOs at the SWRP from reaching the Rio Grande, the Water Authority has either completely plugged the storm water outfalls with concrete or built a large earthen dam in front of them. Water Authority staff is working on the design of two storm/spill retention basins: one on the north side and another on the south side of the plant site. When complete, all runoff will be detained and pumped back to the head of the plant thereby eliminating the need for future storm water discharge points. The drainage ponds will also provide on-site storage in the event of a major power failure to provide on-site containment to prevent overflows leaving the plant property. All of these improvements will be complete by the December 2015 in accordance with the Administrative Order CWA-06-2015-1752.

**Figure 4 – SWRP SSO's
CY 2011 to 2015**



Only two overflows from the SWRP from 2011 until 2015 have resulted in discharges to the Rio Grande. All others have been successfully captured, pumped and treated. The most recent SSO, however, which was caused by a power surge, resulted in a significant quantity of primary effluent reaching the river and we have committed to eliminate that possibility from happening again. We have two Administrative Orders to complete specific actions and provided our first progress report at the end of June 2015.

With respect to the Complaint, the Water Authority has the following comments:

THE COMPLAINT RESTATES PREVIOUS ERRONEOUS ALLEGATIONS

Finding 9. *“Part I.A. of the permit places certain limitations on the quality and quantity of effluent discharged by Respondent. The relevant discharge limitations are specified in Attachment A.”*

Response: Attachment A contains a partial list of the Limitations and Monitoring Requirements of the National Pollutant Discharge Elimination System (NPDES) permit effective May 1, 2005 – September 30, 2012. A copy of the Limitations and Monitoring Requirements from the current NPDES permit, effective October 1, 2012, is attached for reference (Attachment 3).

Finding 10. *“Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facility that exceed the permitted effluent limitations established in Part I.A. of the permit, as specified in Attachment B.”*

Response: Attachment B – Effluent Violations is a list of 49 effluent violations occurring from January 1, 2011 through November 30, 2014. The Water Authority has provided responses regarding most of the listed violations in responses to Administrative Orders dated July 2, 2013 and September 3, 2014 (Attachments 4 and 5, respectively).

The 18 violations listed for “Biochemical Oxygen Demand, 5-Day, 30-Day Average” from October 31, 2012 through May 31, 2014 were generated based on a typographical error in the NPDES permit. The loading limitation was listed as 709 pounds per day (lbs/day) cBOD. Per our request, EPA Region 6 modified the permit on December 1, 2014 and revised the limit to 9,508 lbs/day cBOD. In December 2014, the Water Authority submitted revised DMRs from October 2012 – October 2014. These violations were removed from the EPA Enforcement Compliance History Online (ECHO) database in early 2015.

Regarding the violation for “Mercury, Total Daily Maximum” noted for October 31, 2012, an amended October 2012 DMR was submitted to EPA in June 2013. The Water Authority followed EPA guidance for the analytical method (EPA Method 1631) that allowed for blank correction. This violation has been removed from the EPA ECHO database. The list also included the July 2011 daily maximum ammonia nitrogen violation twice.

In addition, the list included only the violations of the greatest magnitude. There were 24 other violations reported to EPA from January 2011 – December 2011, nine (9) other violations reported to EPA from January 2012 – August 2012, and one (1) violation reported to EPA in January 2015. Attachment 6 contains corrections to the list of effluent violations.

Finding 11. *Sanitary Sewer Overflow (“SSO”) bypass reports filed by Respondent with EPA in compliance with the permit show unauthorized discharges. The unauthorized discharges are specified in Attachment C.*

Complaint, Docket Number: CWA-06-2015-1777

Permit Number: NM0022250

July 14, 2015

Page 6

Response: Attachment C - Unauthorized Discharges is list of overflows from the sanitary sewer or on the SWRP Plant site that occurred from January 1, 2011 to February 28, 2015.

The Water Authority reviewed the Unauthorized Discharges listed in Attachment C. Attachment 7 identifies the discrepancies. There are 10 SSOs in Attachment C that need to be removed due to duplication. There are 140 unauthorized discharges that should be added to Attachment C.

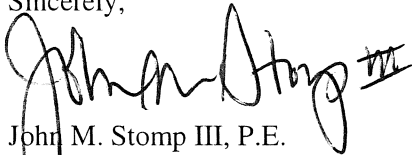
THE WATER AUTHORITY REMAINS COMMITTED TO CONTINUOUS IMPROVEMENT

We believe that the proposed penalty is unnecessarily punitive because the Water Authority is already designing and constructing further improvements to the wastewater treatment plant. Projects under study and design include biological nutrient removal monitoring systems, anaerobic digester renewal, dissolved air flotation systems, blower filtration systems, new anaerobic digesters and new primary clarifiers. These improvements are outlined in Administrative Order CWA-06-2015-1733 and the Revised Corrective Action Plan submitted in May 2014 (Attachment 8).

Since 2011, the Water Authority has committed itself to and has shown improving compliance with our NPDES permit. The Water Authority realizes that this goal is not yet complete, but will continue to work to eliminate permit violations. The Water Authority has requested a meeting with EPA to discuss the allegations in the Complaint and to discuss ongoing compliance issues.

Please contact me at (505) 289-3150 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,



John M. Stomp III, P.E.
Chief Operating Officer

cc: Robert Houston, EPA Region 6, Compliance Assurance and Enforcement Division
Ellen Chang-Vaughan, EPA Attorney (6RC-EW)
Bruce Yurdin, New Mexico Environment Department

Attachments:

1. Water Authority's Answer to the Administrative Complaint
2. Exceedances of Effluent Limits Graphs
3. Effluent Limitations and Monitoring Requirements for NPDES permit (NM0022250) effective October 1, 2012
4. July 2, 2013 Response to AO Letter
5. September 3, 2014 Response to AO Letter, sans attachments
6. List of Effluent Violations (January 2011 – November 2014) – Revised
7. Unauthorized Discharges (January 2011 – February 2015) – Revised
8. Revised Corrective Action Plan, Southside Water Reclamation Plant, May 2014

Attachment 1

Water Authority's Answer to the Administrative Complaint

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6**

In the Matter of

Docket No. CWA-06-2015-1777

Albuquerque Bernalillo County
Water Utility Authority,
A New Mexico political subdivision,

Proceeding to Assess a Class II
Civil Penalty under Section 309(g)
of the Clean Water Act

Respondent

NPDES No. NM0022250

**WATER AUTHORITY'S ANSWER
to the ADMINISTRATIVE COMPLAINT**

Respondent in this matter, the Albuquerque Bernalillo County Water Utility Authority ("Water Authority") states the following for its Answer to the Administrative Complaint in the above captioned matter.

1. In response to the introductory section of the Administrative Complaint identified as "Statutory Authority", the Water Authority is without knowledge or information sufficient to admit that the delegation of authorities was proper under the Act or that the Administrative Complaint was properly issued in accordance with the Act, and therefore denies the allegations of the first paragraph. Pleading further, the Water Authority denies the conclusory statement that it should be ordered to pay a civil penalty because it has violated the Act and the regulations promulgated thereunder.
2. As to the allegations contained in Paragraphs 1, 2, 3, 4, 7, and 8 of the Administrative Complaint, Respondent admits the same.
3. Paragraphs 5 and 6 of the Administrative Complaint appear to be statements of law or procedure which require no response. To the extent these Paragraphs are intended to state

allegations, Respondent denies the same.

4. As to the allegations contained in Paragraph 9 of the Administrative Complaint, Respondent denies the same as Attachment A does not correctly state the standards in the Water Authority's currently applicable October 1, 2012 NPDES Permit No. NM0022250 as identified in Paragraph 7 of the Complaint.
5. As to the allegations contained in Paragraph 10 of the Administrative Complaint, Respondent denies the same to the extent Attachment B contains errors and omissions as to the applicable standards in the permit.
6. As to the allegations contained in Paragraph 11 of the Administrative Complaint, Respondent denies the same to the extent Attachment C contains errors and omissions as to the applicable permit.
7. As to the allegations contained in Paragraph 12 of the Administrative Complaint, Respondent denies the same. Pleading further, the Water Authority states that: (A) there cannot be continuing violations as alleged because the Water Authority has not used sulfur dioxide in its waste water process since 2011 and (B) the allegations concerning the subject fish kill incident should be considered moot and/or time-barred as the incident occurred under a previous permit and was the subject of a previously withdrawn Administrative Complaint.
8. As to the allegations contained in Paragraph 13 of the Administrative Complaint, Respondent denies the same. Pleading further, the Water Authority timely responded to the referenced Administrative Order by correcting the reporting errors upon which the Administrative Order was based.
9. As to the allegations contained in Paragraph 14 of the Administrative Complaint,

Respondent denies the same to the extent that the Water Authority did take corrective action to prevent recurrence of permit violations in response to the referenced Administrative Order and no mercury or ammonia violations have occurred since that Administrative Order.

10. As to the allegations contained in Paragraphs 15 and 16 of the Administrative Complaint, Respondent admits the same.
11. Paragraphs 17 and 18 of the Administrative Complaints state legal conclusions which do not require a response from the Water Authority and to the extent a response is required, the Water Authority denies the allegations contained therein.
12. As to the allegations contained in Paragraphs 19 and 20 of the Administrative Complaint, Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in the paragraphs and therefore, denies them.
13. As to the allegations contained in Paragraphs 21 and 22 of the Administrative Complaint, Respondent denies the same.
14. In response to Paragraph 23 of the Administrative Complaint, Respondent elects to request a hearing using the administrative procedures specified in 40 CFR Part 22, Subpart I.
15. In response to Paragraphs 24, 25, 26, 27 and 28 of the Administrative Complaint, Respondent states that this Answer containing Respondent's reply to the allegations listed in the Findings and otherwise compliant with the applicable procedural rules was timely filed within thirty (30) days after receipt of the Complaint in this matter. Respondent denies that it has admitted by default any fact or allegation of the Complaint. To the extent any fact or allegation contained in the Complaint is not addressed fully within the other paragraphs of this Answer, that fact or allegation is hereby specifically denied. Pleading further, Respondent does not waive any of its procedural rights and hereby requests a full evidentiary

hearing concerning the allegations in the Complaint.

16. In response to Paragraphs 29, 30 and 31 of the Administrative Complaint, Respondent states that by its Answer, it has properly contested material facts and the appropriateness of the penalty and is entitled to a full evidentiary hearing concerning the allegations in the Complaint.
17. Paragraphs 32, 33 and 34 of the Administrative Complaint appear to be statements of law or procedure which require no response. To the extent these Paragraphs are intended to state allegations, Respondent denies the same.

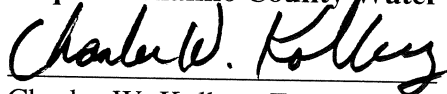
AFFIRMATIVE DEFENSES

1. Complainant should be estopped from alleging violations in the Complaint which were previously addressed, resolved and/or withdrawn.
2. Some, if not all, of the allegations in the Complaint have been fully addressed in accord with, and in satisfaction of, prior Administrative Orders.
3. Some of the allegations are moot because they occurred under the prior NPDES permit and were the subject of a previous Administrative Complaint which was withdrawn.

WHEREFORE, Respondent seeks a full evidentiary hearing resulting in an Order assessing no fines or penalties and dismissing the Complaint in its entirety and for such other and further relief as is just and proper in the circumstances.

Respectfully submitted:

Albuquerque Bernalillo County Water Utility Authority



Charles W. Kolberg Esq.

General Counsel

P. O. Box 568

Albuquerque, New Mexico 87103

Telephone: (505) 289-3051

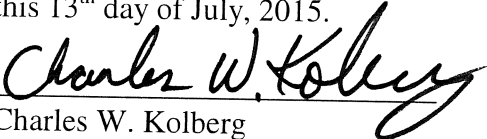
I hereby certify that a true copy of this Answer was mailed to:

Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas TX 75202-2733

and

Ellen Chang-Vaughn (6RC-EW)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

this 13th day of July, 2015.



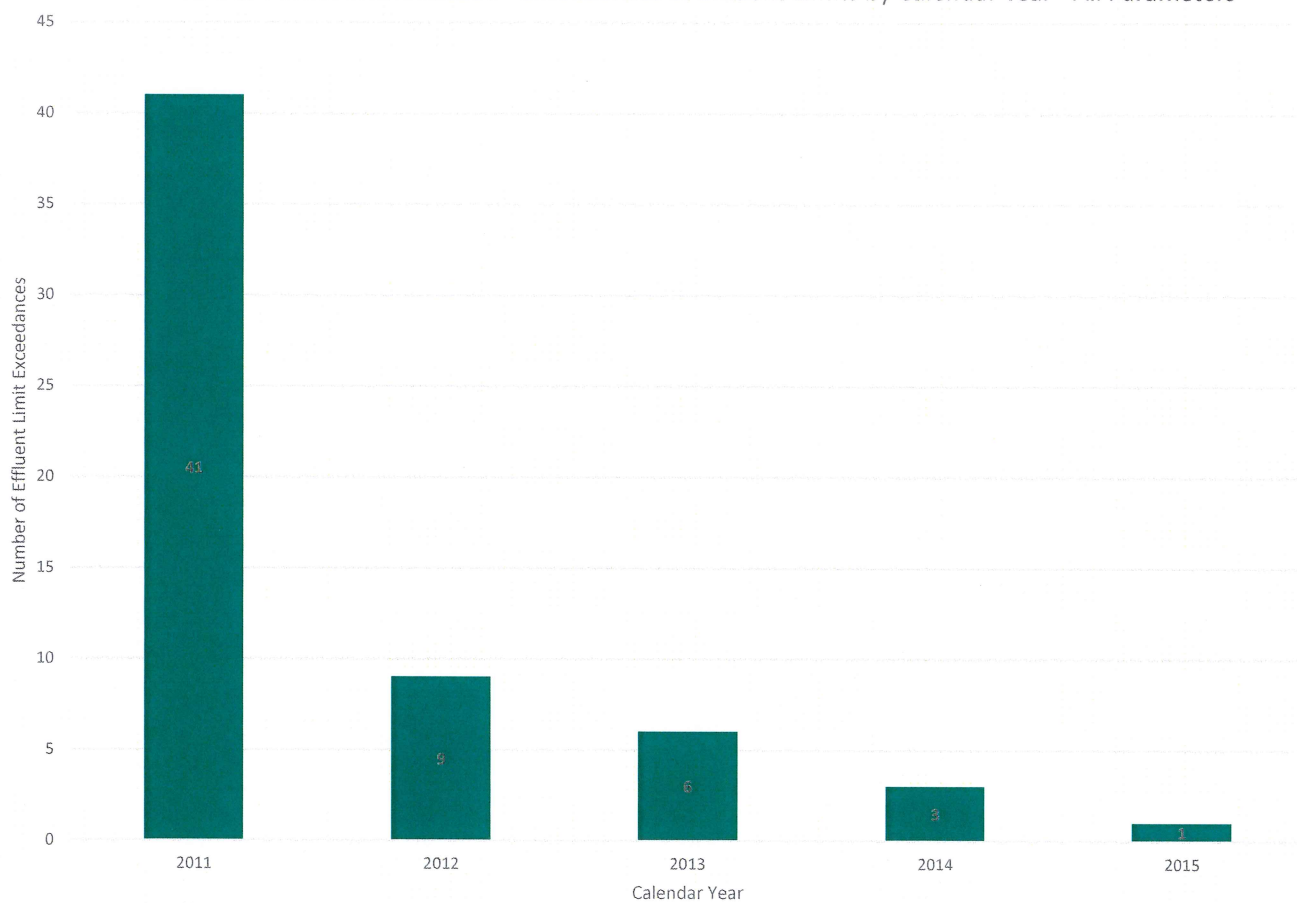
Charles W. Kolberg

P. O. Box 568
Albuquerque, New Mexico 87103
Telephone: (505) 289-3051

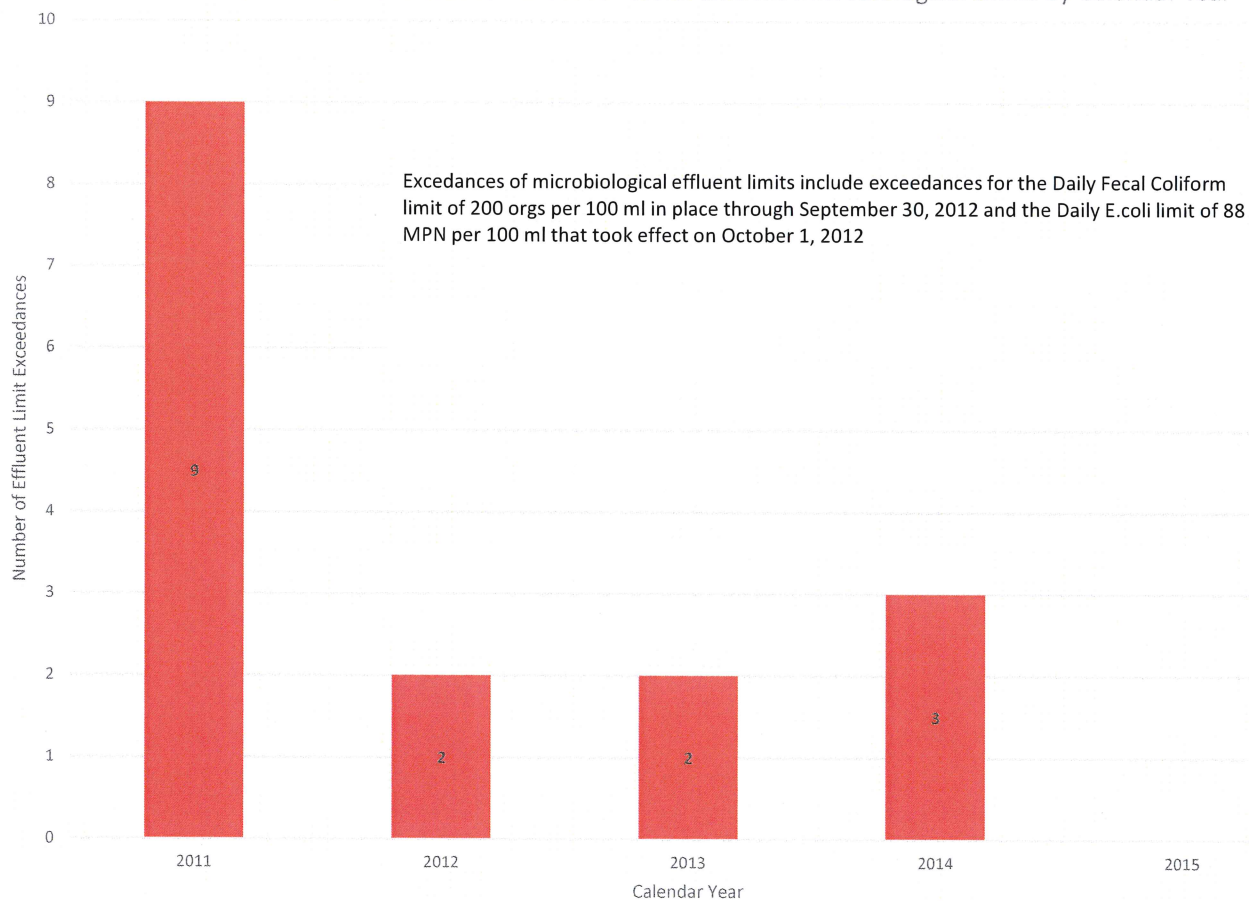
Attachment 2

Exceedances of Effluent Limits Graphs

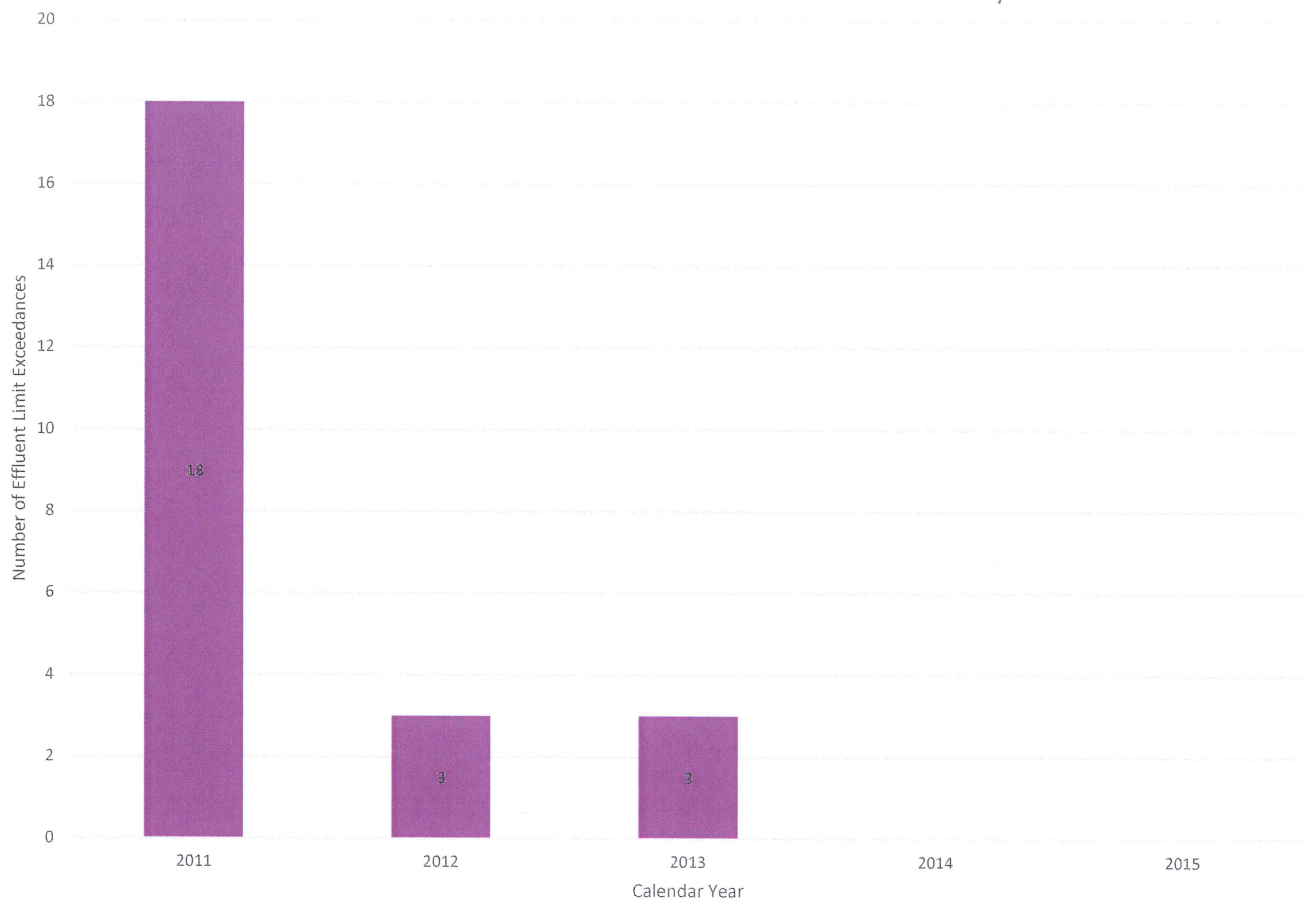
NPDES Permit #NM0022250 - Exceedances of Effluent Limits by Calendar Year - All Parameters



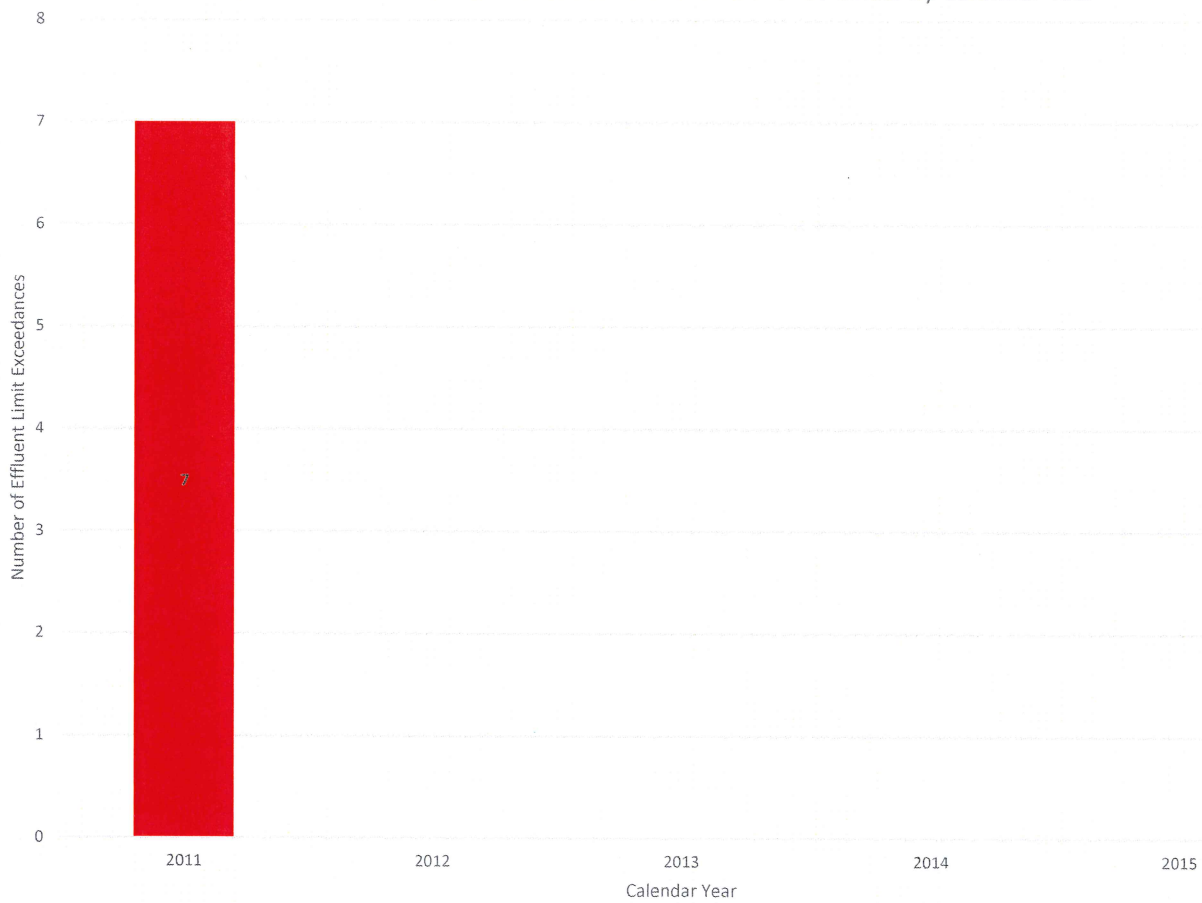
NPDES Permit #NM0022250 - Exceedances of Effluent Microbiological Limits by Calendar Year



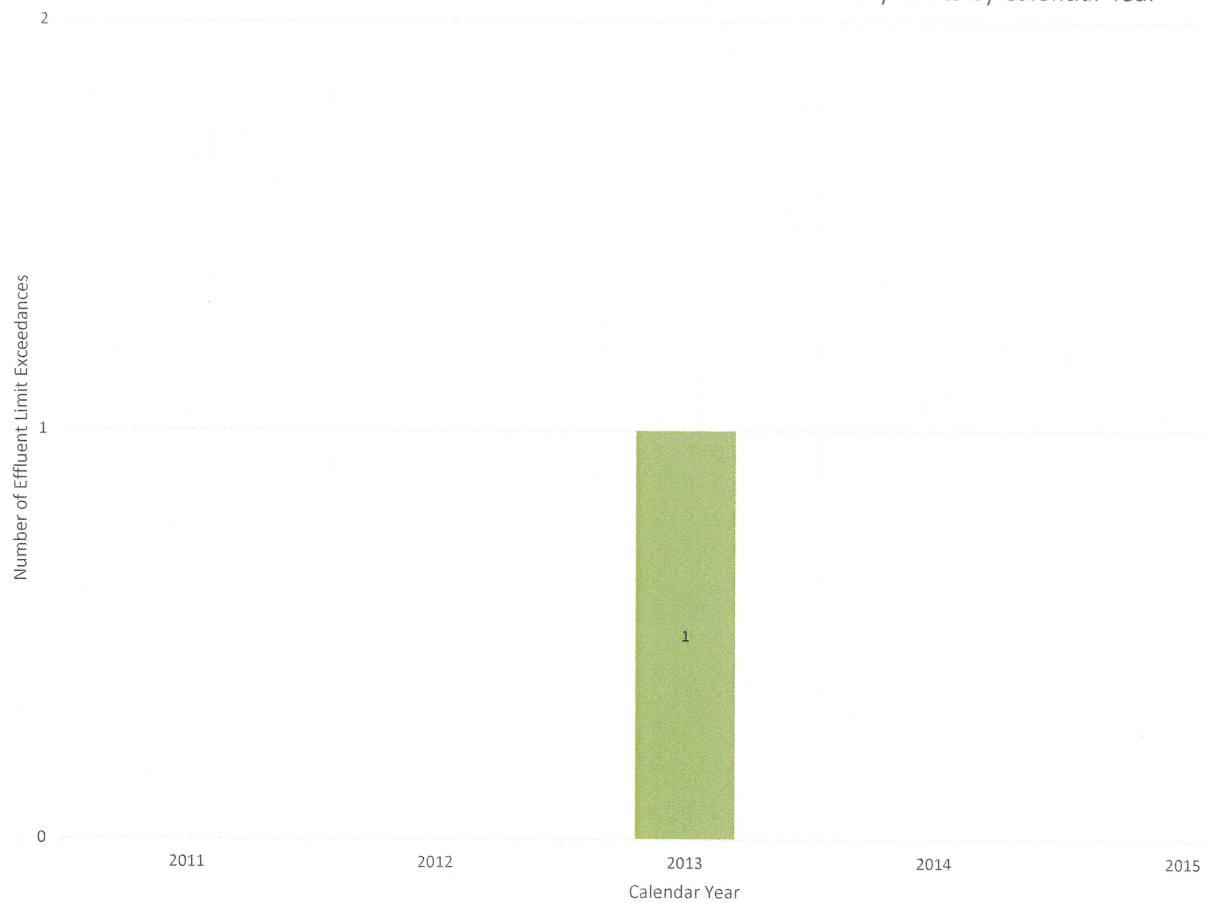
NPDES Permit #NM0022250 - Exceedances of Effluent Ammonia Limits by Calendar Year



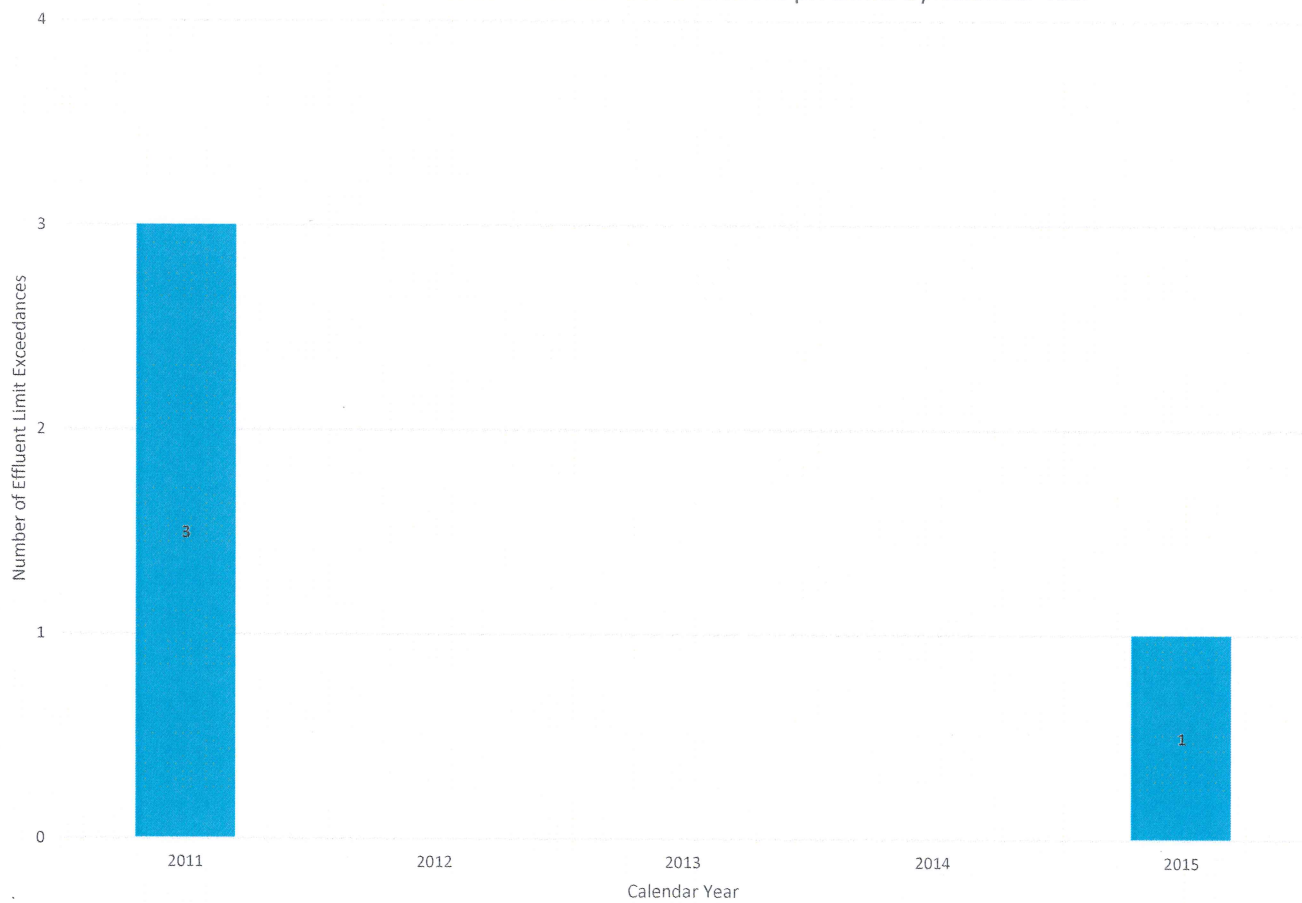
NPDES Permit #NM0022250 - Exceedances of Effluent TSS Limits by Calendar Year



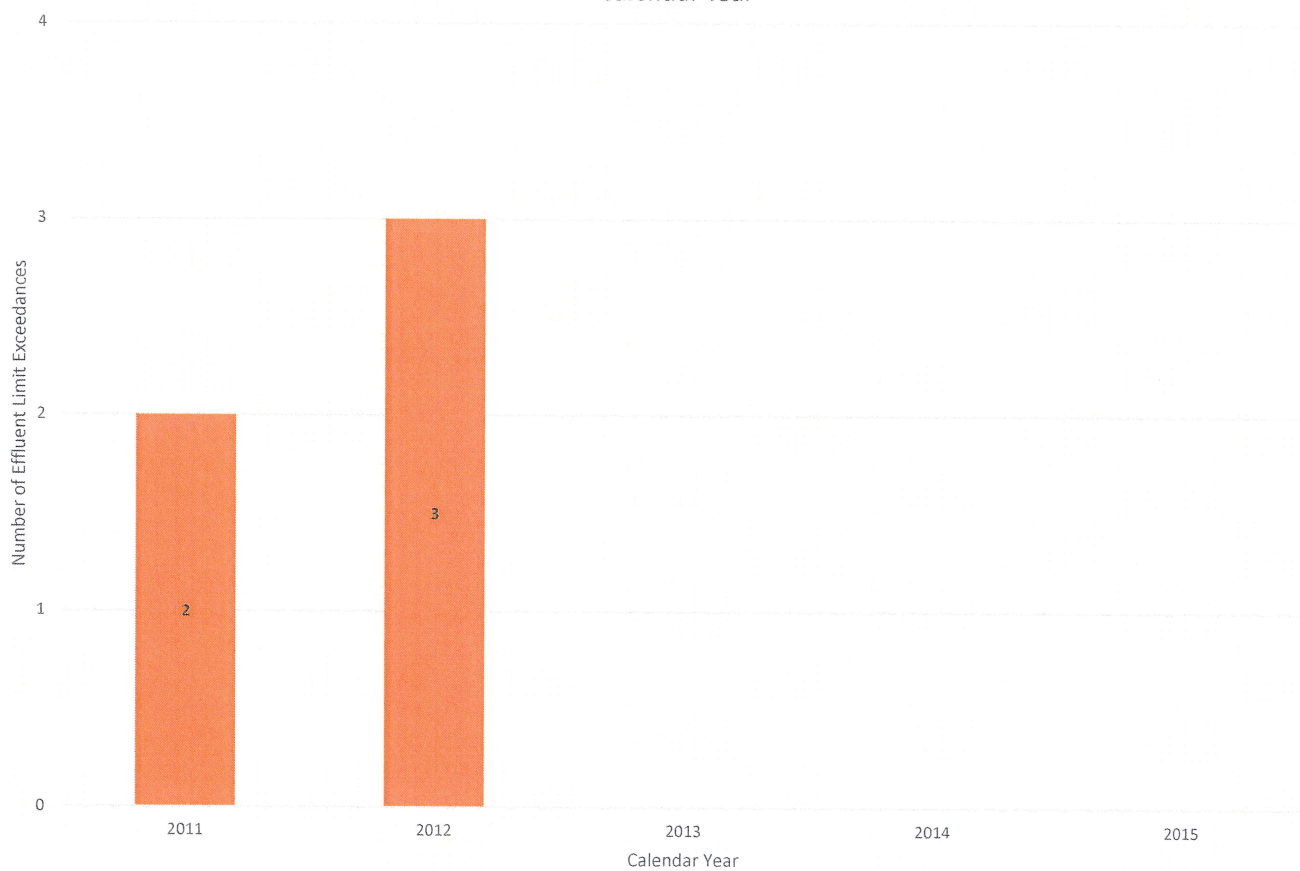
NPDES Permit #NM0022250 - Exceedances of Effluent Mercury Limits by Calendar Year



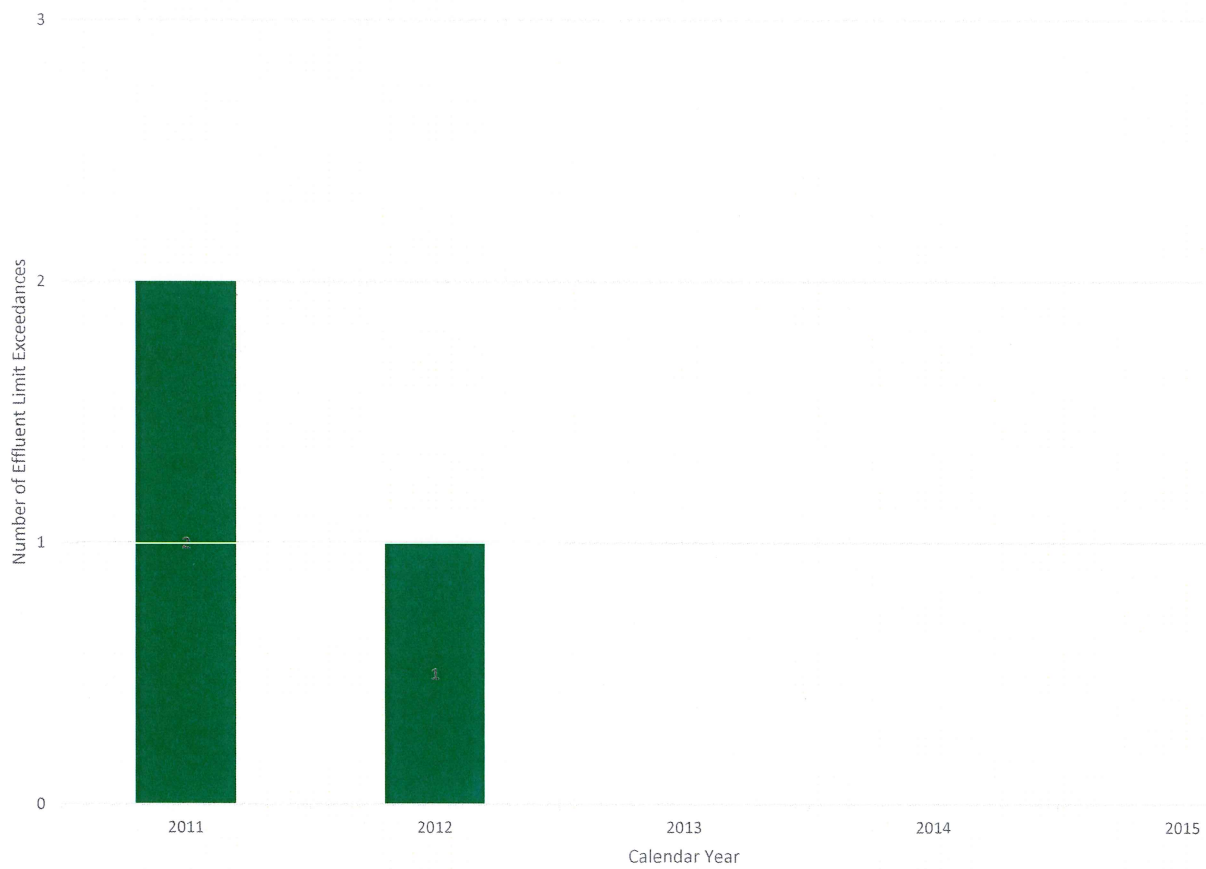
NPDES Permit #NM0022250 - Exceedances of Effluent pH Limits by Calendar Year



NPDES Permit #NM0022250 - Exceedances of Effluent Total Inorganic Nitrogen Limits by
Calendar Year



NPDES Permit #NM0022250 - Exceedances of Effluent Total Residual Chlorine Limits by
Calendar Year



Attachment 3

**Effluent Limitations and Monitoring Requirements for NPDES permit (NM0022250) effective
October 1, 2012**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

DEC 01 2014

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7014 0150 0000 2453 0329)

REPLY TO: 6WQ-NP

Mr. John M. Stomp, III, P.E.
Chief Operating Officer
Albuquerque Bernalillo County Water Utility Authority
PO Box 568
Albuquerque, NM 87103

Re: Modification of Permit Conditions for Albuquerque Bernalillo County Water Utility
Authority Southside Water Reclamation Plant NPDES Permit NM00022250

Dear Mr. Stomp, III:

The permit issued on August 30, 2012, incorrectly stated some permit conditions. Pursuant to 40 CFR 122.63(a), the following minor permit administrative changes are made to Part I:

- Mass limit for CBOD₅ (Part I.A.1 in page 1 of Part I) has been corrected as 9,508 lbs/day for 30-day average.
- Mass limits for Total Inorganic Nitrogen (Part I.A.1 in page 1 of Part I) have been corrected as 6,338 lbs/day for 30-day average and 9,508 lbs/day for daily maximum.
- Footnote P at 85% removal of TSS (Part I.A.1 in page 1 of Part I) has been removed.
- Mailing P.O. Box for NMED (Part I.C.2 in page 4 of part I) has been updated to P.O. Box 5469.
- Contact telephone number for the U.S. Fish and Wildlife Service (Part I.C.6 in page 6 of part I) has been updated to 505-342-9900.
- Contact telephone number for Pueblo of Isleta (Part I.C.6 in page 6 of part I) has been updated to (505) 869-7565.

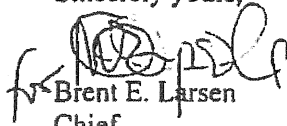
Clarifications on Parts II & III of the issued permit are:

- Conditions 4(d) and 6 in Appendix C of Part II (pages 5 & 6, respectively) are related to condition 3 of this appendix.
- E. coli bacteria is part of the Fecal coliform group; condition F.18 of Part III (page 9) is applicable to E. coli bacteria pursuant to 40 CFR 122.21(j)(4)(viii).

The revised pages of Part I of the final permit are enclosed. Please discard the incorrect copies. Should you have any question on any aspect of the administrative change, please feel free to contact Tung Nguyen of the NPDES Permits Branch at the above address or Voice: (214)

665-7153, Fax: (214) 665-2191, or E-mail: nguyen.tung@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent E. Larsen", is written over a circular stamp or seal.

Chief

Permit & Technical Assistance Section

Enclosures

cc w/enclosure:

New Mexico Environment Department

Pueblo of Isleta

U.S. Fish and Wildlife Service

PART I – REQUIREMENTS FOR NPDES PERMITS**SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS****1. OUTFALL 001: FINAL Effluent Limits – 76 MGD Design Flow**

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated municipal wastewater to the Rio Grande, in Segment Number 20.6.4.105, from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS						MONITORING REQUIREMENTS	
	lbs/day, unless noted			mg/l, unless noted (*M)			MEASUREMENT FREQUENCY	SAMPLE TYPE
POLLUTANT	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG		
Flow	Report MGD	Report MGD	Report MGD	***	***	***	Continuous	Totalizing Meter
Carbonaceous Biochemical Oxygen Demand, 5-day	9508	N/A	Report	15	N/A	22.5	Daily	24-Hour Composite
Total Suspended Solids	19015	N/A	28522	30	N/A	45	Daily	24-Hour Composite
Total Suspended Solids % removal, minimum (*R)	≥85%	---	---	---	---	---	Daily	Calculation
E. Coli Bacteria cfu/100 ml (*C)	135 (*B)	Report (*B)	N/A	47 (*C)	88 (*C)	N/A	Daily	Grab
Ammonia-Nitrogen (Total as Nitrogen)	634	951	N/A	1.0	1.5	N/A	Daily	24-Hour Composite
Total Inorganic Nitrogen, (as Nitrogen) (*N)	6338	9508	N/A	10	15	N/A	Daily	24-Hour Composite
Dissolved Oxygen, minimum	N/A	N/A	N/A	5 mg/l	N/A	N/A	Daily	Grab
Mercury, Total	0.005	0.008	N/A	0.008 ug/l (*H)	0.012 ug/l (*H)	N/A	Once/week	24-Hour Composite
Total Residual Chlorine	N/A	N/A	N/A	N/A	11 ug/l	N/A	Daily	Instantaneous Grab (*T)
PCBs (*G)	N/A	Report (*G)	N/A	N/A	Report (*G)	N/A	Once (*G)	24-Hour Composite
Arsenic, Total	Report	Report	N/A	Report	Report	N/A	Once/Month	24-Hour Composite

FLOATING SOLIDS, VISIBLE FOAM AND/OR OILS

All waters shall be free from objectionable oils, scum, foam, grease, and other floating materials and suspended substances of a persistent nature resulting from other than natural causes including but not limited to visible films of oil, globules of oil, grease or solids in or on the water, or coatings on stream banks.

Samples taken in compliance with the monitoring requirements specified above shall be taken from the discharge after the final treatment unit and prior to the receiving stream.

B. SCHEDULE OF COMPLIANCE

NONE

C. MONITORING AND REPORTING (MAJOR DISCHARGES)

1. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge.
2. Monitoring information required shall be submitted using either the paper Discharge Monitoring Report (DMR) or electronic; NetDMR formats as required in Part III, D.4. If the facility chooses not to use the NetDMR format, the permittee shall submit paper copies of the DMR's, and all other reports to the EPA, NMED and the Pueblo of Isleta at the following addresses:

EPA:
Compliance Assurance and Enforcement Division
Water Enforcement Branch (6EN-W)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

New Mexico:
Program Manager
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
1190 Saint Francis Drive
Santa Fe, NM 87502

prior approval granted by the permitting authority for this procedure to be acceptable. Data reported must also include evidence to show that the proper correlation continues to exist after approval.

6. The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary). Any noncompliance which may endanger health or the environment shall also be orally reported to the Pueblo of Isleta at (505) 869-7565 and the U. S. Fish and Wildlife Service, Albuquerque Field office at (505) 342-9900 as soon as possible, but within 12 hours from the time the permittee becomes aware of the circumstance. Notification shall be made to the EPA at the following e-mail address: <R6_NPDES_Reporting@epa.gov>, as soon as possible, but within 24-hours from the time the permittee becomes aware of the circumstance. Lastly, oral notification shall also be to the New Mexico Environment Department at (505) 827-0187 as soon as possible, but within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided to EPA, the New Mexico Environment Department, the Pueblo of Isleta and the U. S. Fish and Wildlife Service, Albuquerque Field office, within 5 days of the time the permittee becomes aware of the circumstance.
7. The permittee shall also submit a copy of an annual summary of the data that results from whole effluent toxicity testing to:

Field Supervisor
U.S. Fish and Wildlife Service Field Office
2105 Osuna NE
Albuquerque, NM 87113
8. Any and all reports, correspondence and material(s), required to be submitted to the EPA, including but not limited to those identified in No's 1 through 7 above of this part, shall also be reported to the NMED and the Pueblo of Isleta at the addresses noted in No. 2 above.

D. POLLUTION PREVENTION REQUIREMENTS

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

Attachment 4
July 2, 2013 Response to AO Letter



Albuquerque Bernalillo County
Water Utility Authority

PO Box 568
Albuquerque, NM 87103
505-768-2500
www.abcwua.org

July 2, 2013

FEDERAL EXPRESS/CERTIFIED

Chair
Art De La Cruz
County of Bernalillo
Commissioner, District 2

Vice Chair
Ray Garduño
City of Albuquerque
Councilor, District 6

Richard J. Berry
City of Albuquerque
Mayor

Maggie Hart Stebbins
County of Bernalillo
Commissioner, District 3

Trudy E. Jones
City of Albuquerque
Councilor, District 8

Debbie O'Malley
County of Bernalillo
Commissioner, District 1

Ken Sanchez
City of Albuquerque
Councilor, District 1

Ex-Officio Member
Pablo R. Rael
Village of Los Ranchos
Board Trustee

Executive Director
Mark S. Sanchez

Website
www.abcwua.org

Ms. Hannah Branning
Water Enforcement Branch (6EN-WC)
U.S. Environmental Protection Agency
Region 6 1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Administrative Order, Docket Number: CWA-06-2013-1807
Permit Number: NM0022250

Dear Ms. Branning:

The Water Authority received the referenced Administrative Order (AO) on June 10, 2013 and has prepared this response in accordance with the requested information.

Section 309(a)(3) Compliance Order of the AO requires the Albuquerque Bernalillo County Water Utility Authority (Water Authority) to take such steps as necessary to comply with the effluent limitation provisions of the permit. This correspondence is submitted in response to the AO. Information pertinent to the violations noted in item 10 of the findings in the AO is provided below.

Attachment B

Mercury, Total Violation

In response to the Mercury, Total (Mercury) violation listed for October 31, 2012, please see the attached revised Discharge Monitoring Report (DMR) submitted to the Water Enforcement Branch on Thursday, June 20, 2013. As detailed in the cover letter for the revised DMR, the Mercury concentration for the monthly sample collected October 5, 2012 was reported as 0.013 micrograms per liter (µg/L). That reported value exceeded the permit discharge limit daily maximum (DAILY MAX) concentration of 0.012 µg/L.

The EPA Guidance for Implementation and Use of EPA Method 1631 for the Determination of Low-Level Mercury (40 CFR Part 136) (EPA 821-R-01-023, March 2001) will be followed in the future which allows for blank correction of sample results in certain instances. Unless EPA provides more specific

Ms. Hannah Branning
Administrative Order, Docket Number: CWA-06-2013-1807
Permit Number: NM0022250
July 2, 2013
Page 2

guidance, the Water Authority will be following the criteria established in 40 CFR Part 136 as follows:

Under 40 CFR Part 136, the mercury violation met the specifications in Section 9.4 of method 1631 which allows for subtracting the result from the field blank collected on 10/5/12 (1.42 nanograms per liter (ng/L)) from the result from the sample collected at the outfall on 10/5/2012 (13.4 ng/L). With the allowable corrections to the results made, the reported monitoring result would have been 12.0 ng/L or 0.012 µg/L. Therefore, the permit discharge limit daily maximum concentration of 0.013 µg/L reported in the DMR for October 2012 was revised to include the blank corrected Mercury result of 0.012 µg/L. 0.012 µg/L is not an exceedance of the permit discharge limit daily maximum for Mercury.

Please find attached copies of the revised DMR and the analytical results as reported for the October 5, 2012 monitoring event. The guidance can be downloaded from the EPA website at:
<http://yosemite.epa.gov/water/owrcatalog.nsf/e673c95b11602f2385256ae1007279fe/83ce900c90a4b4d685256b0600723b20!OpenDocument>.

Carbonaceous Biochemical Oxygen Demand, 5-Day

Violations of the permit discharge limitation for Carbonaceous Biochemical Oxygen Demand, 5-Day (CBOD) 30-DAY AVG in lbs/day discharge limit are listed for the months of October, November, and December of 2012 and January of 2013, with values of 1,261, 1,235, 1,230, and 1,277 lbs/day, respectively. The permit specifies a 30-DAY AVG discharge limitation of 709 lbs/day.

Consistent with the method for calculating the other 30-Day average loading limitations contained in the permit, the CBOD loading limitation is based on the concentration (15 milligrams per liter (mg/L)) and is calculated as follows:

$$15 \text{ mg/L} * 76 \text{ MGD} * 8.34 = 9,508 \text{ lbs/day}$$

The 30-DAY AVG concentration levels reported in monthly DMRs since October 2012 have been no greater than 3 mg/L or 20% of the permitted level. The reported 30-DAY AVG loading levels have ranged between 1,107 and 1,557 lbs/day or 12-16% of the recalculated loading limitation.

Based on what appears to be a calculation error, the Water Authority requests a revision to the permit limitation for CBOD.

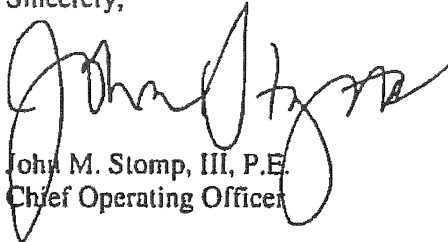
Due to the issue with CBOD, we have completed a review of the Water Authority's NPDES permit which reveals that there may be other potential typographical errors and/or clarifications

Ms. Hannah Branning
Administrative Order, Docket Number: CWA-06-2013-1807
Permit Number: NM0022250
July 2, 2013
Page 3

needed along with some minor wording that should be changed. We feel these revisions would better serve EPA, the Water Authority and the public and will be submitting a letter requesting the revisions to our designated Permit administrator in the next few weeks.

Please contact me at (505) 768-3631 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,



John M. Stomp, III, P.E.
Chief Operating Officer

cc: Mr. James Hogan
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Attachments: Discharge Monitoring Report for October 2012 – REVISED
Analytical results for the October 5, 2012 monitoring event



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3973 FAX: 505-345-4107
Website: www.hallenvironmental.com

Janine Arvizu
Water Utility Authority/WQL
4201 2nd St SW
Albuquerque, NM 87105
TEL: (505) 873-6955
FAX (505) 873-6991

RE: WQL

OrderNo.: 1210370

Dear Janine Arvizu:

Hall Environmental Analysis Laboratory received 4 sample(s) on 10/5/2012 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Nancy Anderson

Oct 15, 2012

tell system

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-8248 • email moscow@anateklabs.com
504 E Sprague Bld. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB
Address: 4901 HAWKINS NE SUITE D
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Batch #: 121009028
Project Name: 1210370

Analytical Results Report

Sample Number 121009028-001 **Sampling Date** 10/5/2012 **Date/Time Received** 10/9/2012 1:00 PM
Client Sample ID 1210370-001A / 200358200/HG1631 SAMPLE **Sampling Time** 10:00 AM
Matrix Water
Comments

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
Mercury-Trace	0.0134	ug/L	0.0005	10/10/2012	ETL	EPA 1631e	

Sample Number 121009028-002 **Sampling Date** 10/5/2012 **Date/Time Received** 10/9/2012 1:00 PM
Client Sample ID 1210370-002A / 200358201/DUPLICATE SAMPLE **Sampling Time** 10:00 AM
Matrix Water
Comments

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
Mercury-Trace	0.0139	ug/L	0.0005	10/10/2012	ETL	EPA 1631e	

Sample Number 121009028-003 **Sampling Date** 10/5/2012 **Date/Time Received** 10/9/2012 1:00 PM
Client Sample ID 1210370-003A / 200358189/FIELD BLANK TP2.7 **Sampling Time** 10:05 AM
Matrix Water
Comments

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
Mercury-Trace	0.00142	ug/L	0.0005	10/10/2012	ETL	EPA 1631e	

Certifications held by Anatek Labs ID: EPA-ID00013; AZ-0701; OQ-ID00013; FLJNELAP154789; ID-ID00013; IN-C-ID-01; KY-00142; MT-CERT0022; NEA: ID00012; OR-ID00001-002; WA-C396
Certifications held by Anatek Labs WA: EPA-WA00102; ID-WA00108; WA-C395; MT-0010025

Thursday, October 11, 2012

Page 1 of 2

Anatek Labs, Inc.

1282 Alluras Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-8248 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: HALL ENVIRONMENTAL ANALYSIS LAB
Address: 4901 HAWKINS NE SUITE D
ALBUQUERQUE, NM 87109
Attn: ANDY FREEMAN

Batch #: 121008028
Project Name: 1210370

Analytical Results Report

Sample Number	121009028-004	Sampling Date	10/5/2012	Date/Time Received	10/9/2012 1:00 PM
Client Sample ID	1210370-004A / 200359198/EQB-TP 2.7 EQB	Sampling Time	9:45 AM		
Matrix	Water				
Comments					

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
Mercury-Trace	0.000724	ug/L	0.0005	10/10/2012	ETL	EPA 1631a	

Authorized Signature


John Coddington, Lab Manager

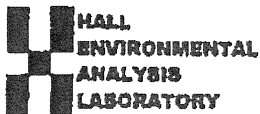
MCL EPA's Maximum Contaminant Level
ND Not Detected
PQL Practical Quantitation Limit

This report shall not be reproduced except in full, without the written approval of the laboratory.
The results reported relate only to the samples indicated.
Soil/solid results are reported on a dry-weight basis unless otherwise noted.

Certifications held by Anatek Labs ID: EPA-ID00013; AZ0701; CO-ID00013; FL(HELAP)E87953; ID-ID00013; UT-C-ID-01; KY-0142; MT-CERT0022; NA: ID00013; OR-ID00001-002; WA-C695
Certifications held by Anatek Labs WA: EPA-WA00169; ID-WA00169; WA-C695; MT-C695

Thursday, October 11, 2012

Page 2 of 2



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87108
TEL: 303-343-3973 FAX: 303-343-4101
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name:	Water Utility Authority	Work Order Number:	1210370
Received by/date:	AG 10/05/12		
Logged By:	Lindsay Mangin	10/5/2012 12:31:00 PM	<i>[Signature]</i>
Completed By:	Lindsay Mangin	10/7/2012 7:00:24 AM	<i>[Signature]</i>
Reviewed By:	AG 10/08/12		

Chain of Custody

1. Were seals intact? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

Log In

4. Coolers are present? (see 12. for cooler specific information) Yes ☒ No ☐ NA ☐
5. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
6. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 5.0°C ? Yes ☐ No ☒ NA ☐

Approved by client

7. Sample(s) in proper container(s)? Yes ☒ No ☐
8. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
9. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
10. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
11. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
12. Were any sample containers received broken? Yes ☐ No ☒
13. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes ☒ No ☐
14. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
15. Is it clear what analyses were requested? Yes ☒ No ☐
16. Were all holding times able to be met?
(If no, notify customer for authorization.) Yes ☒ No ☐

of preserved
bottles checked
for pH: _____
(<2 or >12 unless noted)
Adjusted? _____
Checked by: _____

Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

18. Additional remarks:

19. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	8.8	Good	Not Present			

☐ EDD (Type) _____

Sample Applications

Tel. 505-345-3975 Fax 505-345-4107

[illegible]

Date:	Time:	Relinquished by:	Received by:	Date	Time
				10/05/12	1231

Remarks:	
----------	--

If necessary, samples submitted to Hall Environmental may be subcontracted to other licensed laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly noted on the analytical report.



Albuquerque Bernalillo County
Water Utility Authority

PO Box 568
Albuquerque, NM 87103-0568
505-768-2500
www.abcwua.org

June 17, 2013

Chair
Art De La Cruz
County of Bernalillo
Commissioner, District 2

Vice Chair
Ray Garduño
City of Albuquerque
Councilor, District 8

Richard J. Berry
City of Albuquerque
Mayor

Trudy E. Jones
City of Albuquerque
Councilor, District 8

Debbie O'Malley
County of Bernalillo
Commissioner, District 1

Ken Sanchez
City of Albuquerque
Councilor, District 1

Maggie Hart Stebbins
County of Bernalillo
Commissioner, District 3

Ex-Officio Member
Pablo R. Rael
Village of Los Ranchos
Board Trustee

Executive Director
Mark S. Sanchez
Website:
www.abcwua.org

Ms. Hannah Branning
Environmental Specialist
NPDES Compliance Section (6EN-WC)
US EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Via USPS Priority Mail: Signature Confirmation Receipt

**SUBJECT: NPDES Permit No. NM0022250 – Discharge Monitoring Report for
October 2012 - REVISED**

Dear Ms. Branning:

Please find attached the amended Albuquerque Bernalillo County Water Utility (Water Authority) Discharge Monitoring Report (DMR) for the Southside Water Reclamation Plant (SWRP) for the month of October 2012.

In November, the Water Authority notified you of an exceedance for Mercury. The Mercury concentration for October 5, 2012 was reported as 0.013 micrograms per liter (µg/L) which exceeded the daily maximum concentration of 0.012 µg/L. The required 24-hour notifications were made on October 15, 2012 and the 5-day notification was mailed on October 18, 2012. The DMR was mailed on November 14, 2012.

Since that time, the Water Authority has become familiar with EPA Guidance for Implementation and Use of EPA Method 1631 for the Determination of Low-Level Mercury (40 CFR part 136) (EPA 821-R-01-023, March 2001). This guidance allows for blank correction in certain cases. In review of the data from October 5, 2012, the Water Authority interprets the guidance to allow blank correction for that instance. Therefore, the DMR is amended to include the blank corrected Mercury result. The Mercury concentrations were reported to be 0.013 µg/L in the effluent sample and 0.001 µg/L in the field blank sample. The blank corrected result is 0.012 µg/L which meets the daily maximum concentration specified in the permit.

If there are any questions regarding these reports, please contact me at (505) 331-6021.

Ms. Hannah Branning
NPDES Permit No. NM0022250 -- Discharge Monitoring Report for
October 2012 - REVISED
June 17, 2013
Page 2

Respectfully submitted,

Charles S. Leder

Charles S. Leder, P.E.
Plant Operations Division Manager

Cc: Bruce Yurdin, NMED/SWQB Program Manager
John Stomp III, P.E., Chief Operating Officer
Frank Lujan, Governor, Pueblo of Isleta
Cody Walker, Water Quality Specialist, Pueblo of Isleta

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)**

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS
(Include Facility Name/Location if different)
NAME: ABCWUA
ADDRESS: 4201 2ND ST SW
ALBUQUERQUE, NM 87103

REVISED DMR

PERMIT NUMBER: NM0022250
DISCHARGE NUMBER: 001-A

DMR Mailing ZIP CODE: 87105
MAJOR

TREATED MUNICIPAL WASTEWATER
EXTERNAL OUTFALL

FACILITY: ABCWUA (WWTP #2)
LOCATION: SOUTH-SIDE WATER RECLAM. PT.
ATTN: CHARLES S. LEDER, P.E. DIVISION MANAGER

MONITORING PERIOD
FROM: 10/01/2012 TO: 10/31/2012

NO DISCHARGE ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION			UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE				
Oxygen, dissolved (DO)	SAMPLE MEASUREMENT	-----	-----	-----	5	-----	-----	mg/L	0	DAILY	GRAB
00300 1 0	PERMIT REQUIREMENT	-----	-----	-----	5	-----	-----	mg/L		DAILY	GRAB
Effluent Gross					MD AV MIN						
pH	SAMPLE MEASUREMENT	-----	-----	-----	6.9	-----	7.0	SU	0	DAILY	GRAB
00400 1 0	PERMIT REQUIREMENT	-----	-----	-----	6.5	-----	9.0	SU		DAILY	GRAB
Effluent Gross					MINIMUM		MAXIMUM				
Solids, total suspended	SAMPLE MEASUREMENT	5335	5715	lb/d	-----	11	11	mg/L	0	DAILY	24 HC
00530 1 0	PERMIT REQUIREMENT	19015	28522	lb/d	-----	30	45	mg/L		DAILY	COMP24
Effluent Gross		300A AVG	7 DA AVG			300A AVG	7 DA AVG				
Nitrogen, ammonia total (as N)	SAMPLE MEASUREMENT	169	545	lb/d	-----	0.4	1.1	mg/L	0	DAILY	24 HC
00610 1 0	PERMIT REQUIREMENT	634	951	lb/d	-----	1.0	1.5	mg/L		DAILY	COMP24
Effluent Gross		300A AVG	DAILY MAX			300A AVG	DAILY MAX				
Nitrogen, inorganic total	SAMPLE MEASUREMENT	3577	4262	lb/d	-----	7	9	mg/L	0	DAILY	24HC
00640 1 0	PERMIT REQUIREMENT	9513	6342	lb/d	-----	10	15	mg/L		DAILY	COMP24
Effluent Gross		300A AVG	DAILY MAX			300A AVG	DAILY MAX				
Arsenic, total (as As)	SAMPLE MEASUREMENT	0.002	0.002	lb/d	-----	0.005	0.005	mg/L	0	1/MONTH	24HC
01002 1 0	PERMIT REQUIREMENT	Req. Mon.	Req. Mon.	lb/d	-----	Req. Mon.	Req. Mon.	mg/L		MONTHLY	COMP24
Effluent Gross		300A AVG	DAILY MAX			300A AVG	DAILY MAX				
Flow, in conduit or thru treatment plant	SAMPLE MEASUREMENT	-----	-----	-----	60	60	61	MGD	0	CONTINUOUS	TOTALZ
50050 1 0	PERMIT REQUIREMENT	-----	-----	-----	Req. Mon.	Req. Mon.	Req. Mon.	MGD		CONTINUOUS	TOTALZ
Effluent Gross					300A AVG	7 DA AVG	DAILY MAX				

NAME/TITLE: PRINCIPAL EXECUTIVE OFFICER

Charles S. Leder, P.E.

Division Manager, Plant

TYPED OR PRINTED

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Charles S. Leder

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

(505) 331-6021

AREA CODE

NUMBER

DATE

06/19/2013

MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) * MAXIMUM DAILY AVERAGE FLOW

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
(Include Facility Name/Location if different)
NAME: ABCWUA
ADDRESS: 4201 SECOND ST SW
ALBUQUERQUE, NM 87105

REVISED DMR

ONR Mailing ZIP CODE: 87105
MAJOR
TREATED MUNICIPAL WASTEWATER
EXTERNAL OUTFALL

PERMIT NUMBER: NM0072250
DISCHARGE NUMBER: 001-A

FACILITY: ABCWUA (WWTP #2)
LOCATION: SOUTHWEST WATER RECLAM. FT.
ATTN: CHARLES S. LEDER, P.E. DIVISION MANAGER

MONITORING PERIOD
FROM: 10/01/2012 TO: 10/31/2012

NO DISCHARGE

PARAMETER	SAMPLE MEASUREMENT	VALUE	QUANTITY OR LOADING	UNITS	QUALITY OR CONCENTRATION	VALUE	UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Chlorine, total residual	PERMIT	20						0	DAILY	INSTAN
50060 A0 Disinfection, Preclass Complete	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	135.78	Req. Mon.	BCFUG				0	DAILY	INSTAN
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	0.004	DAILY MAX	BCFUG				0	DAILY	GRAB
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	0.005	DAILY MAX	BCFUG				0	WEEKLY	24HC
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	1371	DAILY MAX	BCFUG				0	WEEKLY	COMP24
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	709	Req. Mon.	BCFUG				0	DAILY	24 HC
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	300A AVG	7 DA AVG					0	DAILY	COMP24
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	98						0	DAILY	CALCTD
51040 10 Effluent Gross	REQUIREMENT									
51040 10 Effluent Gross	PERMIT	86						0	DAILY	CALCTD
51040 10 Effluent Gross	REQUIREMENT									

NAME/TITLE: PRINCIPAL EXECUTIVE OFFICER (I certify under penalty of law that this document and all statements were prepared under my direction or supervision in accordance with a system designed to assure that truthful information is furnished to the public and that the information is true and accurate.)
Charles S. Leder, P.E.
Division Manager, Plant
TYPED OR PRINTED

TELEPHONE: (505) 331-8021
DATE: 08/19/2013
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT: *Charles S. Leder*
AREA CODE: 1500000000

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
"Chlorine is no longer in use on site"
"Mercury tested for Oct 5, 2012 was blank corrected per EPA Method 1631 Implementation Guidance (EPA 821-R-01-023)."

SIGNATURE CONFIRMATION NUMBER: 2305 1590 0000 065T 50E2

Ms. Hannah Branning (6EN-WC)
Environmental Specialist
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

ating.

2013 Oct 17
OCT 2012

DMR-Avis



CUSTOMER:

Keep this receipt. For inquiries:
Access Internet web site at
www.usps.com
or call 1-800-222-1811

- ☒ Priority Mail[®] Service
- ☐ First-Class Mail[®] parcel
- ☐ Package Services parcel

Attachment 5

September 3, 2014 Response to AO Letter, sans attachments

September 3, 2014

Chair

Klarissa J. Peña
City of Albuquerque
Councilor, District 3

Vice Chair

Maggie Hart Stebbins
County of Bernalillo
Commissioner, District 3

Richard J. Berry
City of Albuquerque
Mayor

Art De La Cruz
County of Bernalillo
Commissioner, District 2

Ray Garduño
City of Albuquerque
Councilor, District 6

Trudy E. Jones
City of Albuquerque
Councilor, District 8

Debbie O'Malley
County of Bernalillo
Commissioner, District 1

Ex-Officio Member
Pablo R. Rael
Village of Los Ranchos
Board Trustee

Executive Director
Mark S. Sanchez

Website
www.abcwua.org

Ms. Gladys Gooden-Jackson
Water Enforcement Branch (6EN-WC)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Via USPS Priority Mail: Signature Confirmation Receipt

Subject: Administrative Order, Docket Number: CWA-06-2014-1817
Permit Number: NM0022250

Dear Ms. Gooden-Jackson:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) received the referenced Administrative Order (AO) on July 29, 2014. After noting that Attachment A was the Limitations and Monitoring Requirements of the National Pollutant Discharge Elimination System (NPDES) permit effective May 1, 2005 – September 30, 2012 and that Attachment C had been omitted from the transmittal, a phone call was made as directed in the Administrative Order by Water Authority representatives Barbara Gastian and Charles Leder to Mr. Robert Houston. A voice message was left for Mr. Houston to notify him that Attachment C had been omitted from the permit and request that he return the phone call for further discussion of the AO.

We received a written response from Mr. Houston via electronic communication dated July 31, 2014. Mr. Houston's correspondence acknowledged that Attachment C was not attached and that the AO would be re-issued with adjusted dates.

The amended AO was received on August 8, 2014 (Attachment C was included in the amended AO). However, Attachment A to the AO is the Limitations and Monitoring Requirements of the NPDES permit effective May 1, 2005- September 30, 2012. As you know, the Water Authority received a revised permit with the effective date of October 1, 2012 which we have attached for reference to our response.

RESPONSE TO ADMINISTRATIVE ORDER

SECTION 309(a) COMPLIANCE ORDER

Section 309(a)(3) Compliance Order of the AO orders the Water Authority to take the following action:

"A. Within thirty (30) days of the effective date of this Order, Respondent shall take such steps as necessary to comply with the effluent limitations provision of the permit cited herein."

Attachment B – Effluent Violations is a list of effluent violations occurring from October 31, 2012 through May 31, 2014.

Information provided to respond to the violations is provided below.

1. The first six (6) noted violations were reported as required within 24 hours, to be followed by a five (5) day report. As stated, corrective action was taken after each violation. The violations were not recurrent.

2. The balance of the violations list parameter Biochemical Oxygen Demand, 5-Day, 30-Day Avg. Each violation noted the loading rates in pounds per day (lbs/day) with respect to the permit limit of 709 lbs/day. A total of 19 violations are noted, one (1) in each month from October 2012 through May 2014.

3. On May 30, 2013, NMED/SWQB representatives conducted a Compliance Evaluation Inspection (CEI) at the SWRP. During the course of the CEI, Water Authority representatives first noted that although the 30-DAY AVG (mg/L) and 7-DAY AVG (mg/L) as reported in each Discharge Monitoring Report (DMR) submitted from October 2012 to April 2013 routinely met the permit discharge limits, the permit discharge listing for Carbonaceous Biochemical Oxygen Demand, 30-DAY AVG loading limit was exceeded in each month. It appeared the incorrect loading limit was based on a calculation error in the permit. In the June 10, 2013 CEI Report, NMED/SWQB acknowledged the error on page 10:

"Further Explanations, Section A – Permit Verification – Overall Rating of "Satisfactory", Findings for Permit Verification:

The permit was issued October 1, 2012. Review of the final effluent limits have a carbonaceous Biochemical Oxygen Demand, 5-day, 30 day average loading limit of 709 lbs/day. Their 30-day average is 15 mg/L.

The calculation used for loading is as follows:

$$\text{Concentration (15 mg/L)} \times \text{design flow (76 MGD)} \times 8.34$$

$$15 \text{ mg/L} \times 76 \text{ MGD} \times 8.34 = 9507 \text{ lbs/d}$$

This error was found during this inspection and therefore review of their DMRs show that the 30-day average loading is above the permit limit of 709 lbs/d. EPA may consider modification of the permit to address this issue."

A copy of the report is attached for reference.

4. On June 10, 2013, EPA Administrative Order, Docket Number: CWA-06-2013-1807 was received.

5. In response to AO CWA-06-2013-1807, EPA was informed in a letter dated July 2, 2013 (attached) of the following:

"Carbonaceous Biochemical Oxygen Demand, 5-Day
Violations of the permit discharge limitation for Carbonaceous Biochemical Oxygen Demand, 5-Day (CBOD) 30-DAY AVG in lbs/day discharge limit are listed for the months of October, November, and December of 2012 and January of 2013, with values of 1,261, 1,235, 1,230, and 1,277 lbs/day, respectively. The permit specifies a 30-DAY AVG discharge limitation of 709 lbs/day.

Consistent with the method for calculating the other 30-Day average loading limitations contained in the permit, the CBOD loading limitation is based on the concentration (15 milligrams per liter (mg/L)) and is calculated as follows:

$$15 \text{ mg/L} * 76 \text{ MGD} * 8.34 = 9,508 \text{ lbs/day}$$

The 30-DAY AVG concentration levels reported in monthly DMRs since October 2012 have been no greater than 3 mg/L or 20% of the permitted level. The reported 30-DAY AVG loading levels have ranged between 1,107 and 1,557 lbs/day or 12-16% of the recalculated loading limitation.

Based on what appears to be a calculation error, the Water Authority requests a revision to the permit limitation for CBOD."

6. The Water Authority subsequently reviewed the permit and EPA responses to comments submitted on the draft permit. During the review additional potential typographical errors, along with some necessary minor wording changes were identified. The permit cover letter directs the Water Authority to contact Laurence Giglio of the NPDES Permits Branch should there be any questions regarding the final permit. During a conversation with Mr. Giglio on July 31, 2013 to discuss the request to modify the permit condition, he directed that the request for revisions be addressed to Mr. Larsen and Ms. Johnsey.

7. On August 8, 2013, the Water Authority submitted the attached document: **Basis for the Request to Revise Permit Conditions for Albuquerque Bernalillo County Water Utility Authority Southside Water Reclamation Plant NPDES Permit (NM0022250), Effective Date October 1, 2012** to Mr. Larsen and Ms. Johnsey. The letter included a request to modify the CBOD, carbonaceous 05 (CBOD5) – loading limitation from 709 lbs/day to 9508 lbs/day.

8. The cover letters submitted for all DMRs for May 2013 to the present reference the error in the CBOD loading. The May 2013 DMR submittal is attached to illustrate.

Attachment C - Unauthorized Discharges is list of overflows from the sanitary sewer or on the SWRP Plant site that occurred from January 1, 2011 to June 19, 2014.

The Water Authority reviewed the 182 Unauthorized Discharges listed in Attachment C (178 for sanitary sewer overflows and four (4) for SWRP plant site overflows or spills).

The listing matches Water Authority records with the following exceptions:

1. The "Volume" column does not recognize that prior to May 1, 2013 the Water Authority reported an estimated range for the volume discharged, e.g. "51-100 gallons". Typically, Attachment C reports the highest volume in the specified range.

2. The following overflows were not included:

Date	Location	Volume
May 7, 2013	4201 2 nd St SW	50 gallons
May 7, 2013	4201 2 nd St SW	200 gallons
June 10, 2013	4201 2 nd St SW	3000 gallons
November 16, 2013	4201 2 nd St SW	3000 gallons
November 19, 2013	Claremont & Palomas NE	73 gallons

Notification Reports for the above events, SWRP Overflow DMRs for May 2013, June 2013 and November 2013 and the SSO DMR for November 2013 are attached.

3. The list included six (6) events with "Unknown" volumes. Volumes were included in the reports. The corrections are noted in the table below.

4. The list included three (3) events where the original discharge volumes had been updated in the 5-day Reports and monthly DMRs previously submitted to EPA. The updated volumes are noted in the table below.

Date	Location	Volume
November 12, 2012	Kathryn Ave., SE	Unknown 50 gallons
November 16, 2012	Willow Ct., SE	Unknown 1000 gallons
February 3, 2013	Indian School Rd. & Rita Drive, NE	Unknown 100 gallons
March 19, 2013	Central Ave., SE	Unknown 500 gallons
May 2, 2013	Pino Ave., NE	Unknown 8000 gallons
May 7, 2013	Monte alto Place, NE	Unknown 3750 gallons
September 25, 2013	ABCWUA (onsite)	6,000 6170 gallons offsite, 3.8 MG onsite
January 8, 2014	Armo	550,000 5450 gallons
January 15, 2014	Broadway	450,000 5574 gallons

The SSO DMRs for November 2012, February 2013, March 2013, May 2013 and January 2014 and SWRP Overflow DMR for September 2013 showing the updated volumes are attached.

SECTION 308 INFORMATION DEMAND

Section 308 Information Demand of the AO orders the Water Authority to take the following actions:

"A. Within thirty (30) days of the effective date of this Order, Respondent must certify compliance with the terms and conditions of the permit.

B. Within thirty (30) days of the effective date of this Order, Respondent shall provide written certification to EPA, Region 6 that the violations cited herein have been corrected and the facility is in compliance with the requirements of the permit.

C. In the event that Respondent believes complete correction of the violations cited herein is not possible within thirty (30) days of the effective date of this Order, Respondent shall, within thirty (30) days of the effective date of this Order, submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent these or similar violations from recurring."

Certification of Compliance.

As stated previously, the Water Authority certifies compliance with the terms and conditions of the permit except for the 30-day AVG loading limit for CBOD. Compliance with the CBOD loading limitation is not possible until the permit limitation is modified. A formal request to modify the permit was submitted to EPA Region 6 on August 8, 2013. All other violations have been corrected.

Regarding corrective actions at the SWRP, on May 19, 2014, the Water Authority submitted the attached Revised Corrective Action Plan to Mr. Houston. This document updated the status of the improvements listed in the April 2012 Corrective Action Plan. In addition to those actions, in response to the overflow at the SWRP in September 2013, the following actions were taken or are planned to be completed:

1. Retained Eaton Corporation to conduct a field service report for existing Field Isolation Switchgear (FIS) (2013).
2. Worked with the local electric utility to have a second substation feed available to the plant (2013).
3. Installed new Field Isolation Switchgear (completed summer 2014). The existing FIS will be kept in service as a redundant system.
4. Retained AECOM Technology Corporation in 2014 to conduct an evaluation of the plant electrical system and develop recommendations for improvements.

Regarding unauthorized discharges from the sanitary sewer system, the Water Authority acknowledges that all discharges from the sanitary sewer system are prohibited. The Water Authority accepts the goal of reaching zero sanitary sewer overflows (SSOs) and actively manages to eliminate or minimize such discharges by implementation of the Capacity, Management, Operations and Maintenance (CMOM) Plan (2013), Water Authority Sewer Use and Wastewater Control Ordinance (SUO) (2014) and Fats, Oils and Grease (FOG) Policy (2014). The CMOM Plan, the draft SUO revision and a previous version of the FOG policy were prepared as required by the NPDES permit and submitted to EPA on September 27, 2013. The Water Authority Board adopted revisions to the SUO on January 29, 2014 which became effective on July 1, 2014. The FOG Policy was updated in May 2014. The SUO and the updated FOG policy were submitted to EPA on June 2, 2014 as part of the Pretreatment Program Modification Request. The CMOM Plan, SUO and FOG Policy are attached. Specific activities include:

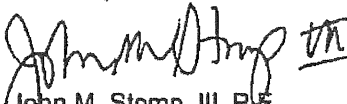
1. CMOM. The CMOM Plan is a comprehensive plan for preventing SSOs with procedures for overflow emergency response, volume spilled and recovered, force main inspection, sewer cleaning, and responding to odor complaints. The CMOM plan also addresses initiatives for improving processes such as closed-circuit televising of sewer lines and the use of root foaming and FOG buster techniques.
2. SUO. The January 29, 2014 Ordinance contains expanded FOG requirements. The Water Authority Pretreatment Program is actively enforcing the newly effective SUO. Notices of Violation (NOVs) have been given to all known (250) Food Service Establishments (FSEs) without Grease Removal Systems (GRSs) and 11 FSEs for non-functional GRSs. The Pretreatment Program will focus enforcement on non-functional and overfilled GRSs in FY15.
3. FOG Policy. The FOG Policy was updated in May 2014. The Pretreatment Program reduces impacts from FOG on the sewer system through outreach/public relations, inspections, and enforcement. A total of 3,606 FSE inspections have been performed between January 1, 2011 and June 30, 2014.

Administrative Order, Docket Number: CWA-06-2014-1817
Permit Number: NM0022250
September 3, 2014
Page 6

The Water Authority has requested a meeting with EPA to discuss the ongoing improvements we are making to resolve these issues along with answering any questions related to the allegations in this AO.

Please contact me at (505) 768-3631 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,



John M. Stomp, III, P.E.
Chief Operating Officer

cc: John Blevins, EPA Region 6, Compliance Assurance and Enforcement Division

Mr. Bruce Yurdin
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Attachments: NPDES permit (NM0022250) effective October 1, 2012
June 10, 2013 NMED Compliance Evaluation Inspection Report for NM0022250
July 2, 2013 Response to AO Letter
August 8, 2013 Permit Modification Request for NM0022250
May 2013 Discharge Monitoring Report for NM0022250
SWRP Overflow 5-Day Reports for May 7, 2013, June 10, 2013 and November 16, 2013 events.
SSO Notification Report for Claremont & Palomas NE on November 19, 2013.
SSO DMRs for November 2012, February 2013, March 2013, May 2013 and November 2013, January 2014.
SWRP Overflow DMRs from May 2013, June 2013, September 2013 and November 2013
May 2014 Revised Corrective Action Plan for SWRP
2013 ABCWUA CMOM Plan
2014 ABCWUA SUO
2014 ABCWUA FOG Policy

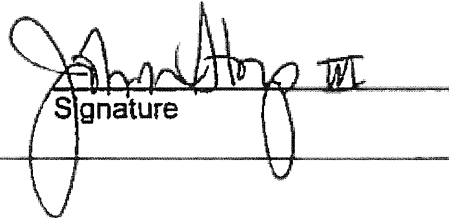
Response to Information Request
Pursuant to Section 308 of the Clean Water Act
Albuquerque Bernalillo County Water Utility Authority
August 2014

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) submits the following response to the EPA Information Request received on August 8, 2014.

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment.

September 3, 2014
Date


Signature

Attachment 6

List of Effluent Violations (January 2011 – November 2014) – Revised

Attachment 6

Effluent Violations - Revised

Date	Outfall	Parameter	Violation	Permit Limit	Comment
January 31, 2011	001A	Coliform, Fecal Daily Maximum	790 per 100 Mil	200 per 100 Mil	Exceedance on 1/9/2011
January 8, 2011	001A	Coliform, Fecal Daily Maximum	540 per 100 Mil	200 per 100 Mil	Reported to EPA but not listed in Attachment B
January 10, 2011	001A	Coliform, Fecal Daily Maximum	673 per 100 Mil	200 per 100 Mil	Reported to EPA but not listed in Attachment B
January 15, 2011	001A	Solids, Total Suspended 7 Day Average	99 mg/L	45 mg/L	Reported to EPA but not listed in Attachment B
January 15, 2011	001A	Solids, Total Suspended 7 Day Average	43,339 lbs./day	28,552 lbs./day	Reported to EPA but not listed in Attachment B
January 31, 2011	001A	Solids, Total Suspended 30-Day Average	45 mg/L	30 mg/L	Reported to EPA but not listed in Attachment B
January 31, 2011	001A	Solids, Total Suspended 30-Day Average	19,534 lbs./day	19,015 lbs./day	Reported to EPA but not listed in Attachment B
February 28, 2011	001A	Solids, Total Suspended 7 Day Average	34,045 lbs./day	28,522 lbs./day	
February 28, 2011	001A	Solids, Total Suspended 30 Day Average	37 mg/L	30 mg/L	
February 28, 2011	001A	Solids, Total Suspended 7 Day Average	83 mg/L	45 mg/L	
March 31, 2011	001A	Chlorine, Total Residual Inst. Maximum	0.35 mg/L	0.011 mg/L	
April 30, 2011	001A	Nitrogen, Ammonia Total 30 Day Average	2,231 lbs./day	1,901 lbs./day	
April 30, 2011	001A	Nitrogen, Ammonia Total 30 Day Average	5.1 mg/L	3 mg/L	Reported to EPA but not listed in Attachment B
April 30, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	18.3 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B

Date	Outfall	Parameter	Violation	Permit Limit	Comment
April 4, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	9.06 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 5, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	11.7 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 18, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	5.96 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 25, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	6.44 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 26, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	14.3 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 27, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	17.4 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 28, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	15.4 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 29, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	16.5 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
April 30, 2011	001A	Nitrogen, Ammonia Total 30-Day Average	2,232 lbs./day	1,901 lbs./day	Reported to EPA but not listed in Attachment B
May 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	12.8 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
May 2, 2011	001A	Nitrogen Ammonia, Total Daily Maximum	8.8 mg/L	4.5 mg/L	Reported to EPA but not listed in Attachment B
June 30, 2011	001A	Chlorine, Total Residual Inst. Maximum	0.07 mg/L	0.011 mg/L	
July 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L	
July 31, 2011	001A	Coliform, Fecal Daily Maximum	1,373 per 100 Mil	200 per 100 Mil	
July 8, 2011	001A	Coliform, Fecal Daily Maximum	918 per 100 Mil	200 per 100 Mil	Reported to EPA but not

Date	Outfall	Parameter	Violation	Permit Limit	Comment
					listed in Attachment B
July 12, 2011	001A	Coliform, Fecal Daily Maximum	430 per 100 Mil	200 per 100 Mil	Reported to EPA but not listed in Attachment B
July 31, 2011	001A	Nitrogen, Inorganic Total 30 Day Average	10.65 mg/L	9.71 mg/L	
July 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L	Duplicate entry
August 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L	
August 8, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	1.6 mg/L	1.5 mg/L	Reported to EPA but not listed in Attachment B
September 30, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	1.9 mg/L	1.5 mg/L	
September 30, 2011	001A	Nitrogen, Inorganic Total Daily Maximum	16.26 mg/L	14.56 mg/L	
September 30, 2011	001A	pH, Minimum	5.7 S.U.	6.6 S.U.	
September 13, 2011	001A	pH, Minimum	6.2 S.U.	6.6 S.U.	Reported to EPA but not listed in Attachment B
September 14, 2011	001A	pH, Minimum	6.4 S.U.	6.6 S.U.	Reported to EPA but not listed in Attachment B
September 30, 2011	001A	Coliform, Fecal Daily Maximum	3,000 per 100 Mil	200 per 100 Mil	
October 31, 2011	001A	Coliform, Fecal Daily Maximum	240 per 100 Mil	200 per 100 Mil	
December 31, 2011	001A	Coliform, Fecal Daily Maximum	220 per 100 Mil	200 per 100 Mil	
April 24, 2012	001A	Coliform, Fecal Daily Maximum	520 per 100 Mil	200 per 100 Mil	Reported to EPA but not listed in Attachment B
June 14, 2012	001A	Chlorine, Total Residual Daily Maximum	0.05 mg/L	0.011 mg/L	Reported to EPA but not listed in Attachment B
July 4, 2012	001A	Nitrogen, Inorganic Total Daily Maximum	14.78 mg/L	14.56 mg/L	Reported to EPA but not listed in Attachment B

Date	Outfall	Parameter	Violation	Permit Limit	Comment
July 6, 2012	001A	Nitrogen, Ammonia Total Daily Maximum	1.77 mg/L	1.5 mg/L	Reported to EPA but not listed in Attachment B
July 10, 2012	001A	Nitrogen, Ammonia Total Daily Maximum	1.83 mg/L	1.5 mg/L	Reported to EPA but not listed in Attachment B
July 11, 2012	001A	Nitrogen, Inorganic Total Daily Maximum	16.00 mg/L	10 mg/L	Reported to EPA but not listed in Attachment B
July 14, 2012	001A	Nitrogen, Ammonia Total Daily Maximum	1.62 mg/L	1.5 mg/L	Reported to EPA but not listed in Attachment B
July 31, 2012	001A	Nitrogen, Inorganic Total 30-Day Average	11.13 mg/L	9.71 mg/L	Reported to EPA but not listed in Attachment B
August 8, 2012	001A	Coliform, Fecal Daily Maximum	260 per 100 Mil	200 per 100 Mil	Reported to EPA but not listed in Attachment B
October 31, 2012	001A	Mercury, Total Daily Maximum	0.014 ug/L	0.012 ug/L	Revised DMR submitted in June 2013.
October 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,261 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
November 30, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,235 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
December 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,230 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
January 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,277 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
February 28, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,290 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
March 31, 2013	001A	Biochemical Oxygen Demand,	1,107 lb.s/day	709 lbs./day	Permit revised in Dec 2014.

Date	Outfall	Parameter	Violation	Permit Limit	Comment
		5-Day, 30-Day Average			Revised DMR submitted in Dec 2014.
May 31, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	1.6 mg/L	1.5 mg/L	
April 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,557 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
May 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,465 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
June 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	900 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
June 30, 2013	001A	E. Coli Bacteria, Daily Maximum	119 Colonies/100 ml	88 Colonies/100 ml	
July 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	858 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
August 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	854 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
September 30, 2013	001A	E. Coli Bacteria, Daily Maximum	153 Colonies/100 ml	88 Colonies/100 ml	
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	1,654 lbs./day	951 lbs./day	
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	3.8 mg/L	1.5 mg/L	
September 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	915 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
October 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	898 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.

Date	Outfall	Parameter	Violation	Permit Limit	Comment
December 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,154 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
December 31, 2013	001A	Mercury, Total Daily Maximum	0.014 ug/L	0.012 ug/L	
February 28, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,082 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
March 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	969 lbs./day	709 lbs./day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
April 30, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	810 lbs/day	709 lbs/day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
May 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	866 lbs/day	709 lbs/day	Permit revised in Dec 2014. Revised DMR submitted in Dec 2014.
July 31, 2014	001A	E. Coli Bacteria, Daily Maximum	411 Colonies/100 ml	88 Colonies/100 ml	
August 31, 2014	001A	E. Coli Bacteria, Daily Maximum	104 Colonies/100 ml	88 Colonies/100 ml	
November 30, 2014	001A	E. Coli Bacteria, Daily Maximum	727 Colonies/100 ml	88 Colonies/100 ml	
January 8, 2015	001A	pH Daily Minimum	6.5 s.u.	6.6 s.u.	Reported to EPA but not listed in Attachment B
July 10, 2015	001A	E. E. Coli Bacteria, Daily Maximum	2,420 Colonies/100 ml	88 Colonies/100 ml	Reported to EPA but not listed in Attachment B

Attachment 7

Unauthorized Discharges (January 2011 – February 2015) – Revised

Attachment 7 Unauthorized Discharges – Revised

Date	Location	Volume	Comments
January 1, 2011	Montano & 4th Street, NW Storm sewer	500 gallons	223 Montano Rd NW
January 3, 2011	10300 Golf Course Rd. NW	500 gallons	
February 4, 2011	1535 Larkin Rd. SW	100 gallons	
February 16, 2011	8001 Mountain Rd.	500 gallons	
February 18, 2011	Candelaria & Morris, NE Street & Storm sewer	100 gallons	10308 Candelaria & Morris
March 5, 2011	10308 Candelaria & Morris Rd.	100 gallons	Duplicate of above
March 5, 2011	9180 Coors Blvd.	1,000 gallons	
March 14, 2011	Kathryn & Dickerson	100 gallons	
March 19, 2011	Westgate & Detitum Busin	1,000 gallons	
March 19, 2011	64th & Bluewater	1,000 100 gallons	
March 20, 2011	2420 Comanche Ave.	1,000 gallons	
March 21, 2011	2420 Comanche Rd. NE	500 gallons	Duplicate of above
March 21, 2011	West Gate & Detitum Busin SW	1,000 gallons	Duplicate of above
March 25, 2011	2205 Broadway Blvd. SE	500 gallons	
March 26, 2011	Pennsylvania & Rhode Island, SE Street	100 gallons	
March 27, 2011	2820 Jessie James Rd.	500 gallons	
March 28, 2011	Mojave St., NW Street	100 gallons	6460 Mojave Street NW
March 28, 2011	Bluewater & 64th St., NW Street & Storm sewer	100 gallons	63 rd & Bluewater NW
March 28, 2011	Pennsylvania & Rhode Island	100 gallons	Duplicate of above
March 28, 2011	2820 Jesse James Dr.	500 gallons	Duplicate of above
April 5, 2011	Cathy Ave., NE Storm sewer & Arroyo	500 gallons	6324 Cathy Ave NE
April 14, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons	914 Broadway Blvd SE
April 19, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons	
May 7, 2011	2921 General Stillwell St.	100 gallons	
May 9, 2011	San Diego Ave., NE Street	100 gallons	8620 San Diego Ave.

Date	Location	Volume	Comments
May 10, 2011	8620 San Diego Ave.	400 gallons	Duplicate of above
May 12, 2011	Candalaria & Pitt Street & Storm sewer	100 gallons	
May 14, 2011	Columbus Circle, NW Golf Course	500 gallons	9906 Columbus Circle NW
May 18, 2011	9906 Columbus Cir.	500 gallons	Duplicate of above
June 7, 2011	5828 Avenida La Barrance	500 gallons	
June 10, 2011	Montgomery & Carlisle Street & Arroyo	500 gallons	
July 5, 2011	University & Sunport, SE Storm sewer	100 gallons	
July 11, 2011	University and Sunport, SE Street & Storm sewer	500 gallons	
August 21, 2011	San Pedro & Topke, NE Street	500 gallons	
August 21, 2011	Outfall 001	10,000 gallons	"<10,000 gallons" was reported.
August 25, 2011	Outfall 001	10,000 gallons	Reported to EPA but not included in Attachment C
September 13, 2011	7521 Menaul Blvd.	500 gallons	
October 3, 2011	Sunport & I-25 Storm sewer & Arroyo	1,000 gallons	
October 3, 2011	Sun Port & I-25	10,000 gallons	Duplicate of above
November 12, 2011	1001 Louisiana	500 gallons	
November 18, 2011	4710 San Mateo Blvd.	500 gallons	
November 24, 2011	Blumenshine & Roseberry	10,000 1,000 gallons	
November 24, 2011	Layton Ave. NE	1,000 gallons	9201 Layton Avenue NW
December 8, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons	
December 10, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons	Reported to EPA but not included in Attachment C
December 24, 2011	Blumenshine & Roseberry, SW Yard & Dirt lot	1,000 gallons	
December 31, 2011	Blumenshine & Roseberry, SW Open lot	1,000 gallons	
January 3, 2012	Rio Puerco Trail, SW Park	500 gallons	10500 Rio Puerco Trail SW
January 3, 2012	110 Altez	100 gallons	
January 12, 2012	SWRP Septage Spill	<200 gallons	Reported to EPA but not included in Attachment C

Date	Location	Volume	Comments
January 14, 2012	Claremont Ave., NE Street	500 gallons	
January 14, 2012	64th & Bluewater, NW Street & Storm sewer	400 500 gallons	
January 23, 2012	Griegos Rd, NW Street & Parking Lot	500 gallons	417 Griegos Rd NW
January 23, 2012	417 Griegos	401 gallons	Duplicate of above
January 25, 2012	Nassau Dr., NE Street	500 gallons	11523 Nassau Dr. NE
January 25, 2012	11523 Nassau Dr.	401 gallons	Duplicate of above
January 29, 2012	2469 Corrales Rd.	1,000 gallons	Corrales Rd. NW
February 9, 2012	2309 Luchetti	1,000 gallons	
February 17, 2012	Sun Port & Yale Blvd.	100 gallons	
February 19, 2012	10323 Chandler Dr.	100 gallons	
February 27, 2012	915 Broadway Blvd.	1,000 gallons	
March 7, 2012	Osuna Road, NE Street	100 gallons	6051 Osuna Road NE
March 10, 2012	Riverview Drive, NW Storm sewer	100 gallons	1200 Riverview Drive SW
March 25, 2012	Orfero Trail, NW Arroyo & Street	400 500 gallons	6316 Orfero Trail NW
April 5, 2012	Tramway Terrace Loop, NE Street	1,000 gallons	1830 Tramway Terrace Loop NE
April 8, 2012	Juan Tabo Blvd., NE Street & Storm Sewer	1,000 gallons	2925 Juan Tabo Blvd. NE
April 19, 2012	Four Hills Rd & Pinon Creek Arroyo	500 gallons	
April 22, 2012	Mary Ellen St & Aspen Avenue Street	1,000 gallons	
April 25, 2012	Mary Ellen Street Street & storm sewer	1,000 gallons	1203 Mary Ellen Street NE
April 25, 2012	Spence Ave., SE Street	500 gallons	704 Spence Avenue SE
May 19, 2012	Sevilla Avenue, NW Arroyo	1,000 gallons	5401 Sevilla Avenue NW
May 22, 2012	Montgomery Blvd., NE Street & storm sewer	1,000 gallons	6500 Montgomery Blvd. NE
May 26, 2012	Jade park Ave. & Ray Street, NE Street	500 gallons	
May 29, 2012	Eastridge Drive., NE Street	500 gallons	1605 Eastridge Drive
June 23, 2012	Irving & Rainbow, NW Street	100 gallons	

Date	Location	Volume	Comments
June 28, 2012	Eubank Blvd., NE Street	100 gallons	113 Eubank Blvd. NE
July 2, 2012	SWRP Onsite Overflow	1000 gallons	Reported to EPA but not included in Attachment C
July 7, 2012	Lafayette Drive, NE Arroyo	500 gallons	3401 Lafayette Drive
July 25, 2012	Taylor Ranch Road, NW Street	500 gallons	5601 Taylor Ranch Road NW
July 29, 2012	Wyoming & Comache, NE Street	100 gallons	
August 1, 2012	Hidden Valley Drive, SE Street	500 gallons	13104 Hidden Valley Drive SE
October 6, 2012	Coors Blvd., NW	500 gallons	1401 Coors Blvd NW
October 17, 2012	Lakeview Place, SW	500 gallons	4320 Lakeview Place SW
October 26, 2012	Iron Street, SE	50 gallons	714 Iron Avenue SE
October 29, 2012	San Joaquin Ave, SE	500 gallons	2738 San Joaquin Avenue SE
October 29, 2012	Richmond Drive, SE	100 gallons	1204 Richmond Drive SE
November 1, 2012	Richmond Drive, SE	100 gallons	1200 Richmond Drive
November 3, 2012	Juan Tabo, NE	500 gallons	528 Juan Tabo NE
November 12, 2012	Kathryn Ave, SE	Unknown 50 gallons	217 Kathryn Avenue SE
November 12, 2012	Septage Spill - SWRP Septage Site	20 gallons	
November 16, 2012	Willow Ct., SE	Unknown 1,000 gallons	
December 3, 2012	Lead Avenue	50-1,000 gallons	608 Willow Ct SE
December 8, 2012	Stagecoach Lane, SE	50 gallons	Lead Avenue & University Blvd
December 17, 2012	Coal / I-25	50 gallons	1424 Stagecoach Lane SE
December 19, 2012	Burmuda & Vienna, NE	100 gallons	
December 20, 2012	Lomas Verde Avenue, NE	50 gallons	
December 30, 2012	Horizone Avenue	100 gallons	13205 Lomas Verde Avenue NE
January 4, 2013	Mt. Rainier Drive, NE	50 gallons	8814 Horizon Blvd NE
January 4, 2013	7th st. & Candelaria	100 gallons	3737 Mt. Rainer Drive NE
January 4, 2013	Spanish Bit Street, NE	1,000-50 gallons	

Date	Location	Volume	Comments
January 10, 2013	Las Casitas Drive, NE	50 gallons	4200 Spanish Bit Street NE
January 12, 2013	Georgia & Summer Avenue, NE	500 gallons	10243 Las Casitas Drive NE
January 12, 2013	Layton Avenue, NE	1,000 gallons	9215 Layton Avenue NE
January 13, 2013	Central Avenue, NW	50 gallons	2437 Central Avenue NW
January 15, 2013	Chelwood & Palo Duro, NE	50 gallons	
January 15, 2013 <u>2014</u>	Boradway	150,000 61,674 gallons	915 Broadway Blvd. NE. SSO occurred in 2014.
January 16, 2013	Yale & Kathryn, SE	100 gallons	
January 17, 2013	Pan American, NE	1,000 gallons	4741 Pan American NE
January 18, 2013 <u>2014</u>	Edith, NE	1,330 gallons	920 Edith Road SE. SSO occurred in 2014.
January 19, 2013	Pickard Avenue, NE	50 gallons	7708 Pickard Avenue NE
January 20, 2013	Pan American Freeway West, NE	500 gallons	4712 Pan American Freeway West NE
January 24, 2013	Cochiti Road, SE	500 gallons	6500 Cochiti Road SE
February 1, 2013	Kathryn Ave, SE	100 gallons	2400 Kathryn Avenue SE
February 1, 2013	Zimmerman Ave, SE	100 gallons	6118 Zimmerman Avenue NE
February 3, 2013	Indian School Rd & Rita Drive, NE	Unknown 100 gallons	
February 4, 2013	Zuni & Palomas, SE	50 gallons	
February 4, 2013	Juan Tabo & Lomas Blvd, NE	500 gallons	
February 6, 2013	Carlisle, NE	100 gallons	2103 Carlisle Blvd NE
February 11, 2013	Indian School & Broadway, NE	100 gallons	
February 16, 2013	Montano, NW	50 gallons	218 Montano NW
February 22, 2013	Overflow at plant	1,000 gallons	
February 22, 2013	Skyline, NE	500 gallons	13701 Skyline NE
March 2, 2013	Caynon View, NE	500 gallons	109 Canyon View PI NE
March 4, 2013	Copper & Camino del Norte, NE	500 gallons	

Date	Location	Volume	Comments
March 6, 2013	Ponderosa Avenue, NE	100 gallons	4512 Ponderosa Avenue NE
March 9, 2013	Del Monte Trail, SW	50 gallons	1300 Del Monte Trail SW
March 12, 2013	Morris Street & Montgomery, NE	1,000 gallons	
March 14, 2013	Pan American Frontage Rd.	500 gallons	Pan American Frontage Rd. & Bogan NE
March 19, 2013	Central Avenue, SE	Unknown 500 gallons	3600 Central Avenue SE
March 23, 2013	Edith, NE	50 gallons	4200 Edith NE
April 11, 2013	Acoma Rd. & Conchas St., SE	1,000 gallons	
April 17, 2013	Montgomery, NE	50 gallons	3520 Montgomery NE
April 26, 2013	Ridgecrest, SE	50 gallons	2811 Ridgecrest Dr SE
May 2, 2013	Pino Avenue, NE	Unknown 8,000 gallons	6501 Pino Avenue SE
May 7, 2013	Monte Alto Place, NE	Unknown 3,750 gallons	175 Monte Largo Pl NE in Maximo
May 7, 2013	SWRP Onsite Overflow	<50	Reported to EPA but not included in Attachment C
May 7, 2013	SWRP Onsite Overflow	<200	Reported to EPA but not included in Attachment C
May 15, 2013	America's Parkway	360 gallons	2121 Americas Parkway NE
May 28, 2013	Spence	60 gallons	1521 Spence Avenue SE
June 5, 2013	Aztec	300 gallons	6219 Aztec Road NE
June 10, 2013	Stage Coach	410 gallons	1316 Stagecoach Lane SE
June 10, 2013	SWRP Onsite Overflow	3000 gallons	Reported to EPA but not included in Attachment C
June 13, 2013	Lobo Place, NE	20 gallons	1336 Lobo Place NE
June 26, 2013	65th St.	255 gallons	65 th St. B/W Churchill & Gonzales SW
July 12, 2013	Woodward	500 gallons	700 Woodward SE
July 19, 2013	Roma & Guaymas	200 gallons	801 Guaymas Pl NE
July 26, 2013	Eubank & Montgomery	3,000 gallons	
August 2, 2013	Los Picaros Road	1,315 gallons	3512 Los Picaros Road
August 5, 2013	Los Picaros Road	150 gallons	3617 Los Picaros Road

Date	Location	Volume	Comments
August 1918, 2013	Barstow & Holly Ave	200 gallons	
August 23, 2013	Four Hills	680 gallons	903 Four Hills Rd SE
August 23, 2013	Montgomery	1,500 gallons	7017 Montgomery Blvd NE
September 2, 2013	Don Luis	3,725 gallons	Don Luis Road & Atrisco Drive SW
September 5, 2013	SWRP Onsite Overflow	30 gallons	Reported to EPA but not included in Attachment C
September 9, 2013	Easy	200 gallons	10617 Easy Street NW
September 17, 2013	Montgomery	7,500 gallons	3541 Montgomery NE
September 25, 2013	ABCWUA (onsite)	5,000 gallons	Revised reports updated amount to: 3.8 MG onsite 6170 gal. offsite
September 26, 2013	Palm Springs	70 gallons	11716 Palm Springs Avenue NE
September 26, 2013	Juan Tabo & Candelaria	260 gallons	
October 6, 2013	Summit Ave	1,275 gallons	1116 Summit Avenue NE
October 15, 2013	Padeo del Norte & Channel	50 gallons	
October 17, 2013	Delicado	50 gallons	10316 Delicado Place NE
October 21, 2013	2nd Street (<u>SSO</u>)	40 gallons	1715 2 nd St. SW.
October 28, 2013	2nd Street (<u>SWRP</u>)	250 gallons	
November 9, 2013	Candlelight	13,100 gallons	3300 Candlelight Drive NE
November 16, 2013	Graceland & Hoyle	100 gallons	
November 16, 2013	SWRP Onsite Overflow	50 gallons	Reported to EPA but not included in Attachment C
November 19, 2013	Claremont & Palomas NE	73 gallons	Reported to EPA but not included in Attachment C
November 20, 2013	Tramway	150 gallons	901 Tramway Blvd. NE
November 21, 2013	Central	500 gallons	1001 Central Ave. NE/North Alley
November 23, 2013	Bellamah & Monte Largo	250 gallons	
November 23, 2013	Menaul	2,500 gallons	12117 Menaul Blvd. NE

Date	Location	Volume	Comments
November 27, 2013	Blue Feather & Lyons	3,300 gallons	
December 1, 2013	Del Mastro	15 gallons	1108 Del Mastro Drive SW
December 11, 2013	Central & Mullberry	100 gallons	
December 14, 2013	La cueva	6,250 gallons	14332 La Cueva Avenue NE
December 16, 2013	La Corrida	2 gallons	5613 La Corrida Road NE
December 19, 2013	Luchetti Road	4,488 gallons	2309 Luchetti Road SW
December 20, 2013	Gladden/Pennsylvania	500 gallons	7517 Gladden/ Pennsylvania NE
January 8, 2014	Arno	550,000 61,550 gallons	903 Arno Street NE
January 9, 2014	Mountain View	625 gallons	13405 Mountain View Avenue NE
January 9 ¹⁹ , 2014	Indian School Road	5,350 gallons	3310 Indian School Rd NE
January 30, 2014	Carlisle, NE	3,975 gallons	Carlisle & Montgomery NE
February 19, 2014	Wyoming	100 gallons	7121 Wyoming Blvd. NE
March 4, 2014	Lomas & University	500 gallons	11824 Lomas Blvd. NE
March 5, 2014	Iron & Elm	500 gallons	
March 8, 2014	Iron	100 gallons	712 Iron Avenue SE
March 12, 2014	Cibola Village	125 gallons	4200 Cibola Village Drive NE
March 25, 2014	Constitution & Stanford	50 gallons	
April 10, 2014	Comanche	31,500 gallons	2401 Comanche Road NE
April 11, 2014	Elizabeth & Menaul	220 gallons	
April 25, 2014	Golf Course	7,500 gallons	10501 Golf Course NW
April 25, 2014	Golf Course & McMahon	500 gallons	
April 27, 2014	Georgia & University	85 gallons	
April 30, 2014	Broadway	20 gallons	904 Broadway NE
May 9, 2014	Harper	100 gallons	5901 Harper NE
May 14, 2014	Jefferson & Montgomery	735 gallons	4404 Montgomery Blvd. NE

Date	Location	Volume	Comments
May 15, 2014	Sagewood	1,500 gallons	701 Sagewood Ct. SE
May 15, 2014	Juan Tabo & Lomas	325 gallons	770 Juan Tabo Blvd. NE
June 8, 2014	Lyon	18,000 gallons	9607 Lyon Rd. NW
June 10, 2014	Lomas & Nakomis	500 gallons	1001 Nakomis Dr. NE
June 19, 2014	Paradise & University	75 gallons	10000 Vivald Rd. NW
July 8, 2014	4200 Luecking Park Avenue NE	1200 gallons	Reported to EPA but not included in Attachment C
July 8, 2014	1135 Corrales Rd. NW	1500 gallons	Reported to EPA but not included in Attachment C
July 11, 2014	Carlisle and Indian School Blvd. NE	700 gallons	Reported to EPA but not included in Attachment C
July 11, 2014	9601 Lyons Rd. NW	12,473 gallons	Reported to EPA but not included in Attachment C
July 20, 2014	Blue Feather & Lyons Blvd. NW	10,846 gallons	Reported to EPA but not included in Attachment C
July 30, 2014	11409 Appian Way NE	52 gallons	Reported to EPA but not included in Attachment C
August 2, 2014	San Francisco & Louisiana NE	2,625 gallons	Reported to EPA but not included in Attachment C
August 2, 2014	10800 Corrales Rd. NW	5,250 gallons	Reported to EPA but not included in Attachment C
September 4, 2014	Tracy and El Solindo	4,000 gallons	
September 13, 2014	5980 Alameda	200 gallons	5980 Alameda Blvd. NE
September 16, 2014	5995 Alameda	40 gallons	5995 Alameda Blvd. NE
September 19, 2014	Southside Water Reclamation Plant	1,000 gallons	
September 28, 2014	Elizabeth and Prospect	50 gallons	10412 Prospect Avenue NE
October 13, 2014	Conchas and Cochiti, SE	10 gallons	
October 27, 2014	Prospect Ave., NE	60 gallons	12312 Prospect Avenue NE
October 30, 2014	La Veta Rd., NE	100 gallons	2800 La Veta Dr. NE
November 7, 2014	Danube, NE	275 gallons	4700 Danube Drive NE

Date	Location	Volume	Comments
November 11, 2014	Bethel Ave., SE	25 gallons	612 Bethel Ave. SE
November 30, 2014	SWRP Onsite Overflow	200 gallons	Reported to EPA but not included in Attachment C
December 20, 2014	Hendrix Ave. & Woodford Dr. NE	725 gallons	Reported to EPA but not included in Attachment C
December 22, 2014	14400 Soula Dr NE	80 gallons	Reported to EPA but not included in Attachment C
January 1, 2015	Juan Tabo Blvd. & Southern Ave. SE	7050 gallons	Reported to EPA but not included in Attachment C
January 7, 2015	7550 Pan American Freeway NE	26,954 gallons	Reported to EPA but not included in Attachment C
January 8, 2015	SWRP Digester #4	1000 gallons	Reported to EPA but not included in Attachment C
January 12, 2015	3904 68 th St. NW	40	Reported to EPA but not included in Attachment C
January 16, 2015	5100 Indian School, NE	40 gallons	
January 17, 2015	10410 Santa Susanna Rd., NE	25 gallons	
January 18, 2015	SWRP Pump House #2	3000 gallons	Reported to EPA but not included in Attachment C
January 27, 2015	2350 Alamo Ave., SE	125 gallons	
January 27, 2015	1000 Central, NE	80 gallons	1115 Central Ave. NE
January 28, 2015	Bluefeather/Lyons Blvd., NW	6,462 gallons	
January 31, 2015	11801 Tivoli Ave. NE	100 gallons	Reported to EPA but not included in Attachment C
February 7, 2015	4411 Canyon Ct., NE	50 gallons	
February 12, 2015	14217 Turner CT., NE	210 gallons	
February 15, 2015	517 Dolores Dr., SW	50 gallons	
February 19, 2015	SWRP Dewatering Facility	150 gallons	Reported to EPA but not included in Attachment C
February 21, 2015	1931 La Veta Dr. NE	615 gallons	Reported to EPA but not included in Attachment C

Date	Location	Volume	Comments
February 21, 2015	11011 Baldwin Ave. NE	810 gallons	Reported to EPA but not included in Attachment C
February 22, 2015	6400 Mossman Pl. NE	810 gallons	Reported to EPA but not included in Attachment C
February 24, 2015	733 Omaha St. NE	100 gallons	Reported to EPA but not included in Attachment C
February 24, 2015	Morris and Chica NE	10 gallons	Reported to EPA but not included in Attachment C
February 27, 2015	4201 Second Street SW	6,000,000 gallons	

Attachment 8

Revised Corrective Action Plan, Southside Water Reclamation Plant, May 2014

REVISED CORRECTIVE ACTION PLAN
SOUTHSIDE WATER RECLAMATION PLANT
MAY 2014

Albuquerque Bernalillo County Water Utility Authority
Revised Corrective Action Plan
May 19, 2014

Per Robert Houston's electronic communication dated May 5, 2014, the Water Authority submits the following Revised Corrective Action Plan (CAP). This plan was revised from the previously developed plan dated April 12, 2012 which was intended to address short-term and long-term exceedances at the Southside Water Reclamation Plant and to develop a Capacity, Management, Operations and Maintenance (CMOM) program. This update is focused on the CAP relative to the improvements at the Southside Water Reclamation Plant.

Southside Water Reclamation Plant Renewal Program Update

This section describes renewal projects at the Southside Water Reclamation Plant (SWRP) since the previously submitted Revised Corrective Action Plan in April of 2012. Recall at that time, the Water Authority had recently completed the following major improvements at the SWRP:

- New Ultraviolet Disinfection Facility to replace chlorine
- Final Clarifier Rehabilitation

The first major new projects in the construction sequence were those identified by the outside consultant from a capacity evaluation and asset assessment of the SWRP process areas. The areas in need of immediate capacity improvements or rehabilitation were (1) the Preliminary Treatment Facility (bar screens & grit removal), (2) Solids Dewatering Facility, and (3) Aeration Blowers. Therefore, these projects were prioritized first in the sequence of construction and are shown on the attached revised Gaant chart. The remaining projects were aligned based on need and the ability to have multiple construction activities at the plant while continuing to operate and to comply with the new NPDES permit.

Fiscal Year 2013 and 2014 Renewal Spending at the SWRP

During Fiscal Year (FY) 2013 (i.e., July 1, 2012 through June 30, 2013), the Water Authority spent approximately \$8.2-million on renewal related projects at the SWRP. This included construction project but also for studies and design. During FY 2014, the Water Authority is projected to spend approximately \$16 million on renewal projects. The Water Authority anticipates spending to ramp up to approximately \$40-million on renewal at the SWRP during FY 2015.

Since the initiation of the current renewal program at the SWRP in 2009, approximately \$50-million has been spent on renewing the plants different facilities. The Water Authority's governing board has committed to spending approximately \$250-million on improvements at the SWRP. As indicated below, the improvements so far competed are having a noticeable improvement in plant performance, system reliability, and reduced maintenance. However, given the backlog of facilities there are times where we are still experiencing more corrective activities and emergency response situations than we would prefer.

We have also made significant efforts in training our operations team along with revising Standard Operating Procedures and Area Process and Expectations for system performance. We will continue with this effort and will begin to focus our attention to improving our training curriculums and startup for new processes as they come on-line.

Work Completed Since April 2012:

Design of New Preliminary Treatment Facility

Recall, the original design concept of constructing the PTF facility with the new Solids Dewatering Facility (SDF) complex at a location significantly away from the existing facilities. This complex was over designed and the bids came in considerably over budget.

The design consultant, CDM Smith, completed a supplemental design analysis report (DAR) in October of 2012 and a new set of bid documents in July 2013. The redesigned PTF facility is located adjacent to the existing PTF to simplify the construction. The new PTF will completely replace the existing screening and grit removal. Grit removal has plagued the operations at the plant for many years and the new PTF facility will include a completely new grit removal system. Also, new bar screens with ¼-inch openings will be used at the new PTF. This will substantially improve the removal of rags and other debris to protect downstream processes.

Re-Evaluation of Solids Dewatering Facility Renewal Alternatives

The design consultant Carollo Engineers has completed a series of technical memoranda evaluating the requirements and options for renewing the Solids Dewatering Facility (SDF). This has included reevaluation of solids generation rates and centrifuge capacity. The consultant also evaluated the potential use of separate treatment for the high ammonia centrate prior to reintroduction of this side stream into the SWRP influent. The consultant also evaluated several alternatives for rehabbing the exiting SDF to compare with constructing an all new SDF. It is anticipated that this design analysis effort will be completed in July of this year. At which point, the design phase will be initiated. It is currently anticipated that construction of the selected improvements will start by mid-2015.

Aeration Blower Capacity Interim Improvements

Two new centrifugal blowers were installed in the South Blower Building. Final instrumentation system connections and debugging are anticipated to be completed by the end of this June so that these blowers are available for the hot weather season. The plant will then have a full complement of 12 blowers. The Water Authority is in the process of acquiring additional spare blowers along with critical spare parts, so that other units can be sent out for rehabilitation. Although there continues to be problems in this area, we are working to ensure that the SWRP always has adequate and redundant aeration capacity.

SCADA System and Fiber Optic Network

The Water Authority upgraded the existing SCADA and plant communications facilities throughout the plant. The work consisted of replacement of the outdated system with new servers and workstations that will greatly improve operator interface and provide useful trending and other data with the new *Historian* package. In addition to the SCADA upgrade, the communication lines throughout the plant were replaced with high speed fiber optic and new coaxial cable. All of these upgrades are needed to integrate with the new operating systems used when the other reconstruction projects come on-line.

Southside Reuse Project

The construction of this project was completed in August of 2012. It provides filtered and chlorinated effluent for non-potable uses at the plant in addition to non-potable water for turf irrigation at parks and other facilities in Southeast Albuquerque. The project is not yet at full capacity as new users are anticipated to be connected over the next few years as funds for their internal improvements are secured.

Aeration Basin Valves

Plant Maintenance replaced several of the influent wastewater and return activated sludge (RAS) control valves. This has provided much better flow control to the 14 Aeration Basins.

Aeration Basin Diffuser Systems

New membrane diffusers have been installed in South Aeration Basin Nos. 3, 4, 7, and 8. The diffusers in South Aeration Basins 1 and 2 are to be renewed in the next month or so. Once this is complete, all of the diffusers in the South Aeration Basins will be in good working condition. (Note the diffusers in South Aeration Basin Nos. 5 and 6 were replaced about 4 years ago.) The Water Authority will then start the process of replacing the diffusers in the six North Aeration Basins. The initial diffuser replacements have had a noticeable beneficial impact on overall air supply needs and the number of air supply blowers required for meeting oxygen transfer needs.

The diffuser system rehabilitation project South Aeration Basin Nos. 7 and 8 also included replacing and reconfiguring the aeration piping. The brittle thin wall pipes were replaced with new Schedule 40 PVC. Also, the stainless steel riser pipes were reconfigured to bring the air control valves up to the deck level and out of the mixed liquor. This will facilitate preventative maintenance on these valves. This improvement will eventually be done for all of the aeration basins.

New Feeder Isolation Switch

A new Feeder Isolation Switch (FIS) Facility has been constructed and started up. The FIS is used to control electrical power from the local utility (i.e., PNM). The new FIS should provide more reliable switching of power supplies, so that the plant systems continue to operate uninterrupted. This will reduce the risk of overflows and out-of-spec effluent. The old FIS will be rehabilitated and serve as a backup facility.

Anaerobic Digester Cleaning

In September of 2012, the Water Authority completed a cycle of cleaning of the 14 anaerobic digesters. Sand and other debris was removed from the digesters, which increased the effective volume of each. It also helped to reduce the wear on the digester mixers, centrifuge feed pumps, and centrifuges. A new cycle of cleaning is to begin in FY 2015.

During the cleaning work, structural deficiencies were identified in one of the secondary digesters impacting the operation of the floating cover. The design and construction of improvements were made.

Anaerobic Digester Mixers

By August of 2014, Plant Maintenance will have rehabilitated 27 of the 40 digester mixers. New, more reliable bearing systems have been installed. This together with the recent cleaning of the digesters, should provide more reliable performance of the mixers and the digestion process. The remainder of the mixers will be renewed during FY2015.

The mixer on the Sludge Blending Tank was also renewed. This mixer is used to blend the primary and secondary sludge prior to its entering the primary anaerobic digesters.

Dissolved Air Flotation Secondary Sludge Thickening Systems

Plant maintenance has continued with the program of replacing key support facilities in the seven trains of dissolved air flotation (DAF) equipment. This includes the influent flow control valves, thickened waste activated sludge (TWAS) pumps, and polymer solution system components.

During May 2013, the Water Authority had a vendor perform an on-site pilot test of a rotating drum thickener technology. The information collected as part of this testing will be incorporated into a study described in a subsequent section of this report.

Solar Power

In 2012, a 1.0 mega-watt solar panel array was brought on-line at the SWRP. This system helps to diversify the plant's electrical power supply.

Projects Under Construction:

New Preliminary Treatment Facility (PTF)

The new PTF is currently being constructed at the SWRP. This \$31-million facility is approximately one-third through its 18-month construction time and is anticipated to be brought on line in June 2015.

Aeration Basin Diffuser Replacements

A contract has recently been awarded to replace 11,000 diffusers in South Contact Basin Nos. 1 and 2. This work is anticipated to be completed by the end of June of this year.

Soda Ash Storage and Feed System

The SWRP has been feeding soda ash to boost the alkalinity and pH of the water. This helps the treatment process as well as maintaining the effluent pH within the range required by the NPDES permit. Improvements are underway to increase the reliability of this system as well as the ability to monitor and control the feed rate.

Projects Under Study or Design:

Solids Dewatering Facility

As described above, the consultant Carollo Engineers is currently in the process of finalizing the design analysis for renewing the SDF. It is anticipated that the design analysis phase will be completed in July of this year. Once completed, the design phase will be initiated followed by construction. It is currently anticipated that construction of the selected improvements will start by mid-2015 and be completed in early 2017.

Biological Nutrient Removal Monitoring Systems

Carollo Engineers is currently designing biological nutrient removal (BNR) monitoring systems for the SWRP. This initial phase will include the installation of on-line ammonia, nitrate, and oxidation reduction potential (ORP) monitoring systems as well as additional dissolved oxygen monitoring systems at a limited number of locations in the process train. If these initial on-line monitors prove to be an effective enhancement to the control of the treatment process, then additional monitors will be installed.

Anaerobic Digester Renewal and Capacity Evaluation

The consulting firm AECOM is current performing an evaluation of digester rehabilitation requirements. This study will provide a comprehensive list of rehabilitation requirements for each of the 14 digesters. This work will include identification of structural, mechanical, electrical, and instrumentation deficiencies.

The work also includes an evaluation of converting some or all of the secondary digesters to primary digesters so as to increase the digestion process capacity. If secondary digesters are converted to primary digesters, then additional liquid digested sludge storage capacity would be constructed. This would be important for efficient operation of the solids dewatering centrifuges. Once the evaluations are complete, the design and construction of the recommended improvements will be initiated.

Dissolved Air Flotation Secondary Sludge Thickening Systems

The Water Authority authorized a contract for the consulting firm Brown and Caldwell to perform an evaluation for renewing the aged DAF systems. This will include evaluating alternative technologies.

Aeration Blower Filtration Systems

The current air filtration systems for the South and North Blower Buildings are obsolete. A new set of filtration systems is currently under design. Once installed, the new systems will facilitate maintenance of the systems so that harmful debris is removed from the air before the blowers and before the aeration diffusers.

High Efficiency Blower Rehabilitation Project

The Water Authority wants to reduce the electrical energy requirements at the SWRP with a future goal of becoming self-sufficient. The existing aeration blowers create the highest energy demand. In the future, the Water Authority will install high efficiency blowers to replace the existing multi-stage centrifugal units. The final project will likely include a mix of both centrifugal and more efficient blowers.

New Anaerobic Digesters

There will be a need for additional digester capacity to meet future flow requirements and to provide operational flexibility for meeting the Part 503 regulations. At the current time, it is anticipated that there may be a need for two additional digesters and more will be needed in the future. There may also be a need for additional sludge blending prior to and following the digesters which will also be included. Liquid storage will also be examined prior to dewatering for additional solids handling flexibility.

New Primary Clarifiers

In the future, there will be a need for additional primary clarifier capacity. It is anticipated that at least two new large clarifiers will be constructed. At that point, the four original, smaller primary clarifiers will likely serve as backup units to facilitate maintenance and rehabilitation of the newer, larger units. Until then, the existing eight clarifiers will receive as-needed rehabilitation to keep them in good working order.

Plant Wide Electrical and Instrumentation Improvements

AECOM has been authorized to perform a comprehensive evaluation of the SWRP's electrical and instrumentation systems. The study will identify deficiencies in these systems, including obsolete and out-of-code equipment. The study will also make recommendations to improve the reliability of the systems to avoid future plant outages. In addition, the study will provide as-built documentation of the existing systems.

Other Plant Improvements and Increased Repairs and Maintenance Budget

There are numerous miscellaneous plant improvements that will need to be completed as the above projects are implemented. The Water Authority has increased the repairs and maintenance budget for these smaller systems to keep up with the scheduled activities.

Summary of the Construction Activities:

The Water Authority is committed to completing the ongoing and planned construction projects in the time provided in the Gantt schedule. Many unforeseen issues may be encountered during implementation and time needed to resolve these issues. Coordination between the construction projects and ensuring continued compliance with the discharge permit is very important to the Water Authority.

